

Jon Loevy			
Date	Description	Categories	Hours
9/2/2014	review memo from GH re: new Baltimore case	Case Development	0.5
9/15/2014	conf w/ GH re: Burgess case and damages/collection in MD	Case Development	0.5
10/15/2014	review Burgess retainer agreement; discuss w/ co-counsel	Case Development	0.25
11/12/2014	review GH email re: assessment of Burgess case; confer	Case Development	0.5
11/14/2014	rev. GH memo and documents re: Burgess GSR; multiple email communications re: same	Case Development	0.75
1/9/2015	review GH memo re: Burgess case/ Goia doc notes; confer w/ GH	Case Development	1
2/23/2015	meet Mr. Burgess by phone; confer w/ co-counsel re: new case; review draft complaint	Case Development, Pleadings	3
3/2/2015	further line edits to Burgess compl; review indemnification memos & confer w/ GH	Case Development, Pleadings	2.5
3/22/2015	respond to GH memo re Burgess immunity; rev. final complaint draft & submit edits	Case Development, Pleadings	2.5
3/23/2015	confer w/ co-counsel re: judge draw; research w/ local counsel re: same	Case Development	0.25
3/30/2015	conf. re: press inquiry on Burgess filing	Case Development	0.25
4/14/2015	comm. w/ [redacted] re: Burgess lawsuit	Case Development	0.25
4/17/2015	comm. w/ [redacted] re: Burgess lawsuit	Case Development	0.25
5/7/2015	conf. re: Burgess story in paper	Case Development	0.25
6/1/2015	witness discussion	Case Development	0.75
6/8/2015	review motion to dismiss & confer w/ team	Pleadings, Case Development	1
6/13/2015	discussion with team and drafting confirming letter; letter re GSR contam docs	Case Development	1
6/15/2015	group disc. Re: strategy to win	Case Development	1.5
7/1/2015	conf. Re: litigation funding for Burgess	Case Development	0.25

7/6/2015	review response to motion to dismiss in Burgess/edits	Pleadings	1
8/17/2015	review NBC story on Burgess; review reply re: motion to dismiss	Case Development, Pleadings	0.75
8/19/2015	review Goldstein reply brief	Pleadings	0.25
9/9/2015	9/9/15 review Stein letter re: Burgess	Case Development	0.25
3/17/2016	GH memo and discuss w/ co-counsel re: indemnification; review Bennett's opinion on motion to dismiss	Case Development	1.75
3/23/2016	confer re: bifurcation hearing re: Burgess	Case Development	0.25
4/27/2016	strategy discussion	Case Development	0.25
5/4/2016	strategy meeting call w/ oc	Case Development	1.5
5/16/2016	review order and motions re: Dorsey & discuss w/ cocounsel; discuss formulating settlement demand w/ AL and co-c	Case Development	1.25
5/23/2016	strategy meeting w/ co-counsel re: burgess; review docs re: same	Case Development	1
6/26/2016	conf. re: Brian Rainey issues w/ co-counsel	Case Development	0.25
6/18/2016	address litigation financing issue in Burgess; discuss w/ co-c	Case Development	0.5
6/28/2016	review comm. Re: Rainey dep & discuss strategy w/ co-counsel	Depositions, Case Development	0.5
6/29/2016	confer w/ Co-C re: Dorsey issues & discuss strategy re: same; confer w/ Steve Art re: discovery document dispute; confer re: Rainey issue	Case Development, Written Discovery	1
7/1/2016	discuss and edits on AL settlement letter; discuss	Case Development	1
7/8/2016	review oc settlement letter and discuss w/ co-c; call w client	Case Development	1.5
7/10/2016	confer w/ counsel re: settlement; review defense letter and discuss w/ AL re: 10m gap, and defense offer of \$150k; confer w/ Client	Case Development	1.25
7/11/2016	team strategy meeting	Case Development	0.5
7/19/2016	strategy discussion and conf call	Case Development	0.75

7/21/2016	comments and strategy w/ litigation team re: alibi interrogatory	Case Development, Interrogatories	0.5
7/28/2016	confer w/ Co-counsel re: staffing Burgess during counsel's maternity leave; devise strategy; address litigation funding inquiry; confer w/ client	Case Development	0.75
7/29/2016	case discussion w/ team	Case Development	0.75
8/4/2016	review Goia disclosure issue & disc. w/ co-counsel	Case Development, Written Discovery	0.25
8/18/2016	respond to pc from Kirkwood re: Burgess o/c nazi connection; confer re: same	Case Development	0.5
7/11/2016	review KP letter re: Rice/Dorsey issues & conf w/ co-c	Case Development, Written Discovery	0.25
9/19/2016	confer w/ co-counsel re: trial date, staffing/strategy; rev. court orders re: in camera	Case Development	1.25
9/22/2016	confer w/ SA re: attorneys' fees statements for Burgess	Case Development	0.25
9/26/2016	confer w/ co-counsel re: staffing new fellows for Burgess; status report	Case Development	0.25
9/27/2016	email to J Corley re: confirming discussion of fee issues	Case Development	0.25
10/7/2016	confer w/ co-c re: Burgess child witnesses	Case Development	0.25
10/24/2016	conf. re: funding issues for Burgess	Case Development	0.25
10/28/2016	review discovery dispute emails/confer re: docs	Written Discovery, Case Development	0.25
11/10/2016	conference w/ co-counsel re Burgess experts, Stine, strategy to win; review docs re: same; redaction dispute, etc.	Case Development	1
11/14/2016	review Burgess pleadings/motions/responses; discuss motion to amend complaint	Pleadings, Case Development	0.5
11/17/2016	confer w/ Co-counsel re: court call	Case Development	0.25
12/20/2016	confer w/ counsel re: damages expert for Burgess	Case Development	0.5

12/27/2016	team strategy meeting	Case Development, Pleadings	1.75
1/2/2017	check in w SGrusin re: Burgess progress; review Burgess pleadings re: amended compl	Case Development, Pleadings	0.5
3/2/2017	confer w/ co=counsel re:discovery dispute	Case Development	0.25
4/10/2017	confer w/ team re: strategy, Rice files, discovery disputes	Case Development, Written Discovery	0.5
5/18/2017	confer w/ GH re: video dep issue for Sabien; issue w/ "hot potato"; review reports	Case Development	0.5
5/24/2017	confer w/ Co-Counsel re: trial date for Nov 6 – staffing and other trial issues	Case Development	0.25
5/31/2017	confer w/ co-counsel re: Stine expert issues for Burgess	Case Development	0.5
6/2/2017	address expert (Stine) cost issue; confer w/ Stine; report to co-counsel re: resolution	Case Development	0.75
6/7/2017	review Osborne issue re: GH memo	Case Development	0.25
6/30/2017	check in w/ Co-C re: burgess strategy updates	Case Development	0.25
7/14/2017	conf. w/ Co-C re: Stine expert report	Case Development	0.25
7/19/2017	conf. w/ counsel re: defense request for neurotesting the client	Case Development	0.25
7/25/2017	confer w/ SGrusin re: Burgess updates / strategy	Case Development	0.25
8/7/2017	review revised Stine billing and discuss w/ co-counsel and Stine	Case Development	0.25
8/24/2017	team call re: litigation progress	Case Development	1
9/4/2017	review Defense expert reports & confer w/ co-counsel re: same	Pleadings, Case Development	2.5
9/7/2017	conf re: funding for client expense; confer re: McCrone bill \$17,543.28 balance	Case Development	0.25
9/12/2017	confer w/ cocounsel re: defense SJ inquiry	Case Development	0.5
9/18/2017	confer w/ Tony B. re: staffing Burgess trial	Trial Preparation, Case Development	0.25
9/20/2017	SJ meeting	Case Development	0.5

10/4/2017	confer w/ Gayle H re: Burgess trial staffing; confer w/ AT re: Gaut invoice; strategy meeting re: FPTO and trial	Case Development, Trial Preparation	0.75
10/5/2017	review and comments on status report; Mil strategy	Pleadings, Case Development	0.5
10/9/2017	assist w/ SJ; review Defense motion; draft the introduction and other sections of response	Pleadings	7.5
10/10/2017	begin trial prep; review docs & prior pleadings	Trial Preparation	6
10/12/2017	assist w/ Stipulation and FPTO issues; review SJ Reply; begin trial strategy prep	Trial Preparation	8
10/13/2017	confer re: trial strategy plan; begin doc review and deps for trial	Trial Preparation	6
10/16/2017- 10/22/2017	intensive trial prep week; review docs, review deps, prepare trial outlines for witnesses at trial; cross-examinations and direct; confer and strategy w/ co-trial counsel; motions in limine and responses	Trial Preparation	90
10/23/2017- 10/29/2017	intensive trial prep week; review docs, review deps, prepare trial outlines for witnesses at trial; cross-examinations and direct; confer and strategy w/ co-trial counsel; witness prep	Trial Preparation	90
10/30/2017- 11/5/2017	final trial prep week; opening statements prep; witness prep in Baltimore	Trial Preparation	105
11/6/2017- 11/12/2017	prep and attend trial week; openings, witnesses, prepare for adverse exams	Trial Preparation, Trial	105
11/13/2017- 11/19/2017	trial week; prep for additional trial witnesses and closing argument	Trial	100
11/20/2017	prep for closing argument	Trial	14
11/21/2017	prep & deliver closings/rebuttal; await jury verdict	Trial	8.5
12/1/2017	confer and assist w/ motion re: Monell claim	Post-Trial	1
12/15/2017	review def. response to Monell motion; confer w/ co-c	Post-Trial	0.5

12/21/2017	rev. Defense motion for new trial & discuss w/ litigation team; divide tasks	Post-Trial	2.75
1/2/2018	confer w/ GH re: attorneys fees and Brown Gold; confer w/ SA re: Rule 59 extension and clerk info	Post-Trial	0.25
1/8/2018	8 being work on PTM response; review record & legal research; draft response	Post-Trial	60
1/15/18-1/21-2018	continue post-trial response; review record & legal research; draft response	Post-Trial	60
1/22/2018-1/26/2018	complete response to motion for new trial	Post-Trial	75
1/29/2018	confer w/ funding source re: Burgess	Post-Trial	0.25
2/8/2018	review Judge Bennett's order denying Monell & discuss w/ team	Post-Trial	1
2/9/2018	review Defense reply re: new trial; confer; GH comm. Re: indem	Post-Trial	1.5
3/9/2018	rev. Court's order denying Rule 50 motion; discuss w/ co-counsel; confer w/ client	Post-Trial	2.25
4/5/2018	review communication from Kelly Perrotti re: Monell/Jurisdiction and discuss w/ team	Post-Trial	0.5
4/11/2018	review defense counsel position on juris.; discuss w/ team; legal research re: same	Post-Trial	1.5
4/12/2018	conf. w/ Steve Art Re: Jurisdiction issue; legal research; edit letter	Post-Trial	1
4/13/2018	confer w. co-counsel re: Andre Davis appearance/conflict?	Post-Trial	0.25
4/18/2018	review docketing statement objections & discuss	Post-Trial	0.75
4/25/2018	confer re: Burgess mediation strategy	Post-Trial	0.5
4/27/2018	rev. & discuss our reponse re: request for conf	Post-Trial	0.25
4/30/2018	prep w/ Sabien and Gayle for mediation; review Owens settlement terms; ptm arguments; address client issue & conf. w/ SB	Post-Trial	1.75

5/1/2018	prep & participate in mediation; debrief mediation, 1m offer, Owens result + discrepancy (owens is white); address issue of amending the judgment	Post-Trial	2.25
5/2/2018	prep for court call re: Rule 54b position and mootness args; attend conf call w/ Judge Bennett; debrief about strategy	Post-Trial	1
6/18/2018	conf. re: litigation loan & annuity; pc w/ client	Post-Trial	0.5
6/29/2018	review Memo re: juris problem	Post-Trial	0.25
6/30/2018	review Goldstein appeal brief & discuss w/ Burgess and litigation team	Post-Trial	2.5
7/2/2018	conf. re: litigation loan	Post-Trial	0.25
7/11/2018	prep and attend team strategy call re: Burgess brief	Post-Trial	2
8/12/2018	response to appellate brief; review record and begin counter-args	Post-Trial	8.5
8/13/2018	response to appellate brief; review record and begin counter-args	Post-Trial	8.5
8/14/2018	response to appellate brief; review record and begin counter-args	Post-Trial	5.5
8/20/2018	motion to extend briefing schedule; disc. w/ team	Post-Trial	0.25
10/5/2018	motion to extend time	Post-Trial	0.25
10/8/2018-10/14/2018	draft appeal brief; legal research; confer w/ team on various issues; dissect the record from 2+ week trial and incorporate into fact section; draft arguments	Post-Trial	70
10/15/2018-10/21/2018	draft appeal brief; legal research; confer w/ team on various issues; dissect the record from 2+ week trial and incorporate into fact section; draft arguments	Post-Trial	70
10/22/2018	finalize appellate brief and file	Post-Trial	15

10/26/2018	discuss and address need to supplement record; disc. Objection by oc; file	Post-Trial	0.5
12/6/2018	review Goldstein reply brief and discuss w/ team	Post-Trial	2.5
1/2/2019	review TB's memo and cases re: ancient docs	Post-Trial	1
1/21/2019	prep oral argument; review briefing	Post-Trial	8
1/22/2019	prep oral argument; review cases and outline args	Post-Trial	8
1/23/2019	prep oral argument; continue outline args	Post-Trial	8
1/24/2019	prep oral argument practice	Post-Trial	4
1/27/2019	prep oral argument continue	Post-Trial	8
1/28/2019	prep oral argument; moot court mock argument practice	Post-Trial	8
1/29/2019	prep & travel for oral argument; moot argument II; confer w/ Tony B re: his memo re: claims not considered instructions; rise & fall; Lehmann	Post-Trial	12
1/30/2019	Oral Argument in Baltimore; prep & attend; debrief client	Post-Trial	4
1/31/2019	review Lewis case; discuss 28j letter based on Lewis; draft supplemental authority; review Goldstein re: same	Post-Trial	7.25
2/27/2019	review Fourth Circuit order re: supplemental briefing and disc. w/ co-c	Post-Trial	1.25
3/10/2019	review and edit our supplemental filing re: Jurisdiction in 4 th circuit	Post-Trial	6.75
3/11/2019	assist in finalize jurisdiction filing	Post-Trial	2.5
3/12/2019	review and discuss Goldstein jurisdictional statement/paper	Post-Trial	2
4/2/2019	review & disc. w/ team Re: Fourth Circuit's order on appeal	Post-Trial	1.25
4/5/2019	review Solicitor Davis' motion to dismiss; confer w/ team	Post-Trial	2
4/8/2019	review transcript from 6/2/18 hearing per Goldstein's request; discuss w/ team	Post-Trial	0.5

4/9/2019	prep and confer re: conference w/ Judge Bennett; attend status	Post-Trial	2
4/10/2019	team conference re: jurisdiction issues; review memo re: same	Post-Trial	0.5
4/28/2019	confer w/ co-counsel re: jurisdiction, Monell claim; sketch response	Post-Trial	2
4/29/2019	assist in prep re: response to Goldstein motion to dismiss; rev. & edit	Post-Trial	3
4/30/2019	review Davis letter and discuss w/ team	Post-Trial	0.5
5/31/2019	review and discuss Judge Bennett's Monell order	Post-Trial	0.75
6/2/2019	review Court's order and debrief w/ team	Post-Trial	1
6/3/2019	further confer re: insufficient judgment/implic. for appeal; confer re: cross appeal strat	Post-Trial	0.25
6/3/2019	confer re: cross-appeal strategy	Post-Trial	0.5
6/10/2019	review emails re: docketing objection & respond	Post-Trial	0.25
6/13/2019	respond to Defense reqs to treat appeal as pre-briefed; confer w/ team re: same	Post-Trial	0.75
6/14/2019	confer w/ Steve Art Re: Burgess appeal & fees	Post-Trial	0.25
6/18/2019	review defense motion re: appeal expedite; discuss w/ team	Post-Trial	0.5
6/19/2019	email to o/c re: attorneys fees; review & disc. Response .	Post-Trial	0.25
6/20/2019	assist in preparing our response to Defendants' Fourth Circuit motion	Post-Trial, Pleadings	4
6/21/2019	review and confer re: Reply to defense motion; draft motion to strike	Post-Trial	4.5
7/2/2019	motion re: attorneys fees	Post-Trial, Pleadings	1
7/9/2019	review Fourth Circuit order, and disc. w/ team	Post-Trial	0.5
7/16/2019	review response and reply re: fees; discuss w/ co-c	Post-Trial	0.25
7/22/2019	review judge Bennett's order denying relief and disc w/ co-c	Post-Trial	0.25

8/6/2019	issue re: unsealed exhibits; responds to o/c request re: Joint Appdx; discuss w/ team	Post-Trial	0.75
8/19/2019	review Goldstein's new Appellate Brief and discuss w/ team	Post-Trial	1.75
8/30/2019	confer w/ SA re: plan for appellate response	Post-Trial	0.5
9/3/2019	begin response to Appellate brief; draft new args	Post-Trial	8.5
9/4/2019	begin response to Appellate brief	Post-Trial	8.5
9/5/2019	cont. appellate brief	Post-Trial	1.5
9/6/2018	seek extension of time re: brief; confer w/ co-counsel re; the plan	Post-Trial	0.25
9/24/2019	continue appeal brief	Post-Trial	8.5
9/25/2019	continue appeal brief	Post-Trial	8.5
9/26/2019	confer w/ co-counsel re: Baltimore solvency & implications for settlement; confer w/ TB re: his points from prior oral argument	Post-Trial	1.25
9/27/2019	review memo and cases re: "independent basis" and continue drafting	Post-Trial	6
9/29/2019	continue new appeal brief	Post-Trial	5
9/30/2019	continue draft appeal brief	Post-Trial	8.5
10/1/2019	continue draft appeal brief	Post-Trial	10
10/2/2019	continue draft appeal brief	Post-Trial	10
10/3/2019	complete and file appellate brief	Post-Trial	12
11/19/2019	review Goldstein reply brief & disc. w/ litigation team	Post-Trial	2
12/16/2019	team meeting re: drafting cross-appeal reply	Post-Trial	0.25
1/5/2020	conf. w/ SA re: our appeal reply	Post-Trial	0.25
1/10/2020	assist in drafting cross-appeal reply	Post-Trial	8.5
9/4/2020	review Steve's Burgess memo re: alternative bases for verdict, and discuss	Post-Trial	0.5
12/6/2020	review briefs for oral arg & notes re: ideas	Post-Trial	4
12/7/2020	begin prep for oral arg; confer w/ JHazinski re: hearsay issue cases update	Post-Trial	8.5

12/8/2020	prep oral argument; review cases and record; moot args w/ cocounsel	Post-Trial	8.5
12/9/2020	prep oral argument; review cases and record; outline args; mock arg	Post-Trial	10
12/10/2020	moot court; prepare oral argument	Post-Trial	12
12/11/2020	prep and attend Oral argument on Fourth Circuit appeal	Post-Trial	5
5/14/2021	review Fourth Circuit opinion and discuss w/ team; review options; call client	Post-Trial	2.25
5/27/2021	review motion to extend & confer re: same	Post-Trial	0.25
6/22/2021	phone conf & emails w/ J Corley re: resolving fees; disc. w/ team	Post-Trial	0.5
6/24/2021	meeting w/ team to collect fee totals for negotiation w/ o/c	Post-Trial	0.5
6/25/2021	fee motion review & confer	Post-Trial	0.25
7/7/2021	conf w/ JCorley re: fee negotiations; report to team	Post-Trial, Pleadings	0.25
7/28/2021	confer w/ co-counsel and o/c re: fee motion extension; draft motion	Post-Trial	0.5
8/11/2021	conf. w/ client	Post-Trial	0.25
8/29/2021	confer w/ co-counsel and o/c re: fee motion extension; draft motion	Post-Trial, Pleadings	0.25
9/27/2021	email exchange w Corley re: fee extension; confer re: same	Post-Trial, Pleadings	0.25
9/28/2021	confer w/ co-counsel and o/c re: fee motion extension; draft motion	Post-Trial, Pleadings	0.25
10/7/2021	team meeting re: fee motions	Fee Petition Preparation	0.25
10/25/2021	begin drafting fee motion	Fee Petition Preparation	8.5
10/26/2021	begin drafting fee motion	Fee Petition Preparation	8.5
10/27/2021	review time sheets for accuracy and redundancy; assist drafting fee motion	Fee Petition Preparation	8.5
	Total hours:		1284

Arthur Loevy

Date	Description	Category	Time
5/16/2016	Discuss settlement demand with team	Settlement	0.5
7/1/2016	Review edits to settlement letter	Settlement	0.5
7/10/2016	Discuss settlement with Jon Loevy (JL)	Settlement	0.25
10/25/2016	Review documents in case in preparation for defendant depositions	Depositions	5
10/27/2016	Prepare for Goldstein and Ritz depositions with Steve Art (SA)	Depositions	12.25
10/28/2016	Prepare for Goldstein and Ritz depositions with SA	Depositions	7
11/1/2016	Prepare for Goldstein deposition; take Goldstein deposition; travel to and from Goldstein deposition	Depositions	18
TOTAL			43.5

Gayle Horn			
Date	Description	Category	Time
8/29/2014	Conversation with Steptoe & MAIP re: Burgess case, status update	Case Development	0.5
9/5/2014	Review Petition for Writ of Actual Innocence; notice of claim; call with Steptoe & MAIP re: Burgess case	Case Development	1.7
9/15/2014	Research on whether BPD is a state or municipal entity	Case Development	2.75
9/11/2014	Research on indemnification/tort caps/respondeat superior/ <i>Monell</i> claims against BPD	Case Development	5
9/16/2014	Pull articles on BPD for potential <i>Monell</i> claim; research GSR	Case Development	0.4
9/24/2014	Call with Susan Friedman re: Burgess case; background and follow-up	Case Development	1.4
9/30/2014	Call with Sabein Burgess (SB) and Susan Friedman re: case, introduction	Case Development	1
10/1/2014	Review documents from Susan Friedman	Case Development	1
10/2/2014	Draft and edit retainer agreement	Case Development	0.2
10/3/2014	Meeting with SB in Baltimore, including preparation and travel time	Case Development	4
10/5/2014	Review documents on case	Case Development	3
10/6/2014	Meeting with Brian Rainey in Baltimore, including preparation and travel time	Case Development	3
10/13/2014	Review documents relating to Charles Dorsey	Case Development	1.7
10/14/2014	Review and digest trial transcripts	Case Development	7
11/12/2014	Call re: indemnification and BPD	Case Development	0.4
11/14/2014	Investigate GSR expert: emails and follow-up to identify expert	Case Development	0.3
1/9/2015	Emails with Jon Loevy (JL) re: case strategy	Case Development	0.4
1/12/2015	Interview Brian Rainey with Mort Smith; Interview Tawanda Dyson with Mort Smith; travel to and from Baltimore and preparation for interviews	Case Development	4
2/5/2015	Review materials in preparation for drafting Complaint	Case Development	4
2/15/2015	Research legal claims in the 4th Circuit: malicious prosecution, due process, <i>Monell</i> , state law claims	Case Development	3

2/16/2015	Draft Complaint	Pleadings	5
2/18/2015	Draft Complaint	Pleadings	5.5
2/23/2015	Draft Complaint	Pleadings	3.3
3/2/2015	Review and incorporate edits from JL and email with JL regarding Complaint; send a copy of Complaint to SB;	Pleadings	0.6
	Confer and email with email with Mike Kanovitz (MK) regarding indemnification and malice	Pleadings	0.4
3/3/2015	Review Complaint with SB	Pleadings	3
3/18/2015	Review and incorporate Liz Wang's and Steve Art's (SA) edits to Complaint	Pleadings	0.8
3/20/2015	Research and brainstorm re: testimonial immunity, expert opinions; call with GSR expert Wayne Niemeyer	Case Development	2.8
3/22/2015	Emails with SA re: Complaint; incorporate edits	Pleadings	0.5
3/23/2015	Finalize Complaint	Pleadings	0.1
3/24/2015	Emails with Lauren Lebata (LL) re: serving the Defendants	Case Development	0.25
3/25/2015	Review news articles on Burgess	Case Development	0.1
3/26/2015	Conversation with Keith Daniels at Fox News; email follow-up	Case Development	0.25
3/30/2015	Emails re: service of summons and Complaint with LL, SA	Case Development	0.2
4/6/2015	Emails with LL and SA re: service on Defendants Weese, Lehman, Van Gelder and Purtell	Case Development	0.1
4/9/2015	Emails with Jessica Rothschild at Steptoe re: SB probation status; call with SB re: probation status, status of case	Case Development	0.4
4/13/2015	Emails with LL and SA re: service on Defendant Ritz; research on Ritz to identify if alive and if so, where living	Case Development	1
4/19/2015	Telephone call (t/c) with SB re: case	Case Development	0.2
4/20/2015	Follow-up emails with Melinda Ek, SA and LL re: SB probation status	Case Development	0.1
4/21/2015	Emails with LL and SA re: service	Case Development	0.1
4/28/2015	Email correspondence with team re: service	Case Development	0.1
4/30/2015	Email correspondence among counsel and with LL/SA re: service	Case Development	0.1
5/5/2015	Email with opposing counsel (o/c) re: service on Goldstein, Neverdon and Ritz	Case Development	0.1
5/6/2015	Email to o/c re: service on Goldstein, Neverdon and Ritz	Case Development	0.1

6/8/2015	Review motions to dismiss (MTD) filed	Motion Practice	1.5
6/10/2015	Finish reading MTD and exhibits	Motion Practice	1
6/11/2015	Emails with SA and summer associate re: Notice of Claim	Motion Practice	0.1
7/1/2015	Emails with SA re: strategy for MTD response	Motion Practice	0.5
7/5/2015	Email to o/c re: consolidated response brief	Motion Practice	0.1
7/6/2015	Review and edit MTD response; brainstorm on <i>Brady</i> claim; research <i>Brady</i> and due diligence; call with summer associate to plan for response	Motion Practice	4.5
7/6/2015	Brainstorm on Brady claim - email with summer	Motion Practice	0.5
7/6/2015	Research Brady and due diligence	Motion Practice	1
7/6/2015	Call with summer associate to plan for response	Motion	0.2
7/7/2015	Draft <i>Brady</i> section of brief	Motion Practice	4
7/7/2015	Review research on <i>Brady</i> , due diligence, MD Rule 3-510	Motion Practice	0.6
7/7/2015	Email with summer re: research on <i>Brady</i> claim	Motion'	0.3
7/8/2015	Research MD Rules 4-266, 4-265, judicial estoppel	Motion Practice	2.6
7/8/2015	Draft response to MTD: facts and legal section	Motion Practice	7
7/9/2015	Draft and edit response to MTD	Motion Practice	11
8/9/2015	Read Defendants' replies to MTD	Motion Practice	2
10/14/2015	Review SA letter to start discovery	Case Development	0.2
11/3/2015	Review letter from SA to o/c re: starting discovery	Case Development	0.1
11/19/2015	Review SA letter requesting scheduling conference	Case Development	0.2
12/8/2015	Call with SB to update on case	Case Development	0.2
2/12/2016	Call with SB to update on case	Case Development	0.2
3/1/2016	Review order on MTD; call with SB to update on case; email with LL and SA to follow up	Case Development	0.7

3/1/2016	Call with SB to update on case	Case Development	0.2
3/1/2016	Emails with LL & SA to follow-up	Case Development	0.1
3/7/2016	t/c with SA re: Burgess, discovery, planning for maternity leave	Case Development	0.25
3/7/2015	research, pull briefs and review Holloman v. Markowski, No. 15-1878 (4th Cir.)	Case Development	0.5
3/15/2016	Review bifurcation motion; review answers	Motion Practice	0.75
3/17/2016	Prep for bifurcation call: research caselaw on bifurcation in D.Md.; email with JL and SA re: indemnification/bifurcation	Motion Practice	2.25
3/23/2016	Prep for court call (digest caselaw) and court hearing on bifurcation	Court Hearing	2.75
3/23/2016	F/u with SA on schedule and draft to-do list for maternity leave	Case Development	0.75
3/23/2016	Emails re: police practices expert	Case Development	0.25
3/23/2016	Review trial testimony of Van Gelder (DVG) from Pulley case	Case Development	0.75
3/23/2016	T/c with Shawn Armbrust re: GSR	Case Development	0.75
3/28/2016	Emails with TK and SA on GSR expert	Case Development	0.1
4/14/2016	Emails with SA, TK and Sarah Grusin (SG) re: prosecutor	Case Development	0.5
5/2/2016	Emails with team re: Sabein, Brian Rainey	Case Development	0.25
5/3/2016	T/c with TK, SG and SA re: case	Case Development	0.75
5/5/2016	Email re: subpoena to Steptoe & Johnson	Written Discovery	0.1
5/11/2016	Review and respond to emails re: pending discovery items	Written Discovery	0.5
5/12/2016	Emails with SA, TK, SG re: insurance and indemnification	Case Development	0.2
5/12/2016	T/c with TK re: Charles Dorsey and follow up emails	Case Development	0.5
5/23/2016	Review interrogatory response	Written Discovery	0.5
6/8/2016	T/c with SB	Case Development	0.2

6/9/2016	Email with SA and JL re: BPD indemnification	Case Development	0.1
6/15/2016	T/c with SA re: case strategy; t/c with SA, TK and SG re: Brian Rainey	Case Development	0.75
6/28/2016	Email with SA, TK and SG re: Brian Rainey	Case Development	0.1
7/6/2016	T/c and emails with TK re: MAIP file	Case Development	0.25
7/11/2016	T/c and emails re: MAIP and Steptoe files	Case Development	0.75
7/13/2016	T/c and email re: Sabein's PC file	Case Development	0.25
7/14/2016	Review ongoing emails and case updates while on maternity leave	Case Development	2.5
7/15/2016	t/c with Shawn Armbrust re: MAIP file	Case Development	0.5
7/28/2016	Text with SB re: case	Case Development	0.1
9/5/2016	Review Offer of Judgment; t/c with SB	Case Development	0.3
9/9/2016	Review FBI 302 (Denise Wilson)	Written Discovery	0.25
9/19/2016	Review case scheduling order and follow-up strategy email	Written Discovery	0.1
9/27/2016	Email with SA re: hiring experts and case update/brainstorming	Case Development	1.25
10/7/2016	Team meeting re: Burgess	Case Development	0.5
10/10/2016	Review homicide file	Case Development	1
10/10/2016	Review trial transcripts	Case Development	1.5
10/10/2016	Team meeting re: to do list in Burgess	Case Development	0.5
10/11/2016	Review prosecutor file and Laura Schach's notes	Written Discovery	0.6
10/11/2016	Emails with TK and SA re: case strategy and deposition scheduling; emails with o/c re: scheduling depositions	Depositions	0.2
10/12/2016	Emails with TK and review of materials re: Howard Rice	Written Discovery	0.3
10/13/2016	Emails with o/c re: deposition scheduling	Depositions	0.2
10/16/2016	Review documents, create deposition outlines and pull exhibits for Lehmann and Purtell depositions	Depositions	8

10/17/2016	Prep for dep: follow-up questions for team on docs, Shack testimony, print exhibits	Depositions	1
10/17/2016	Travel to Baltimore and take deposition of Richard Purtell	Depositions	4.75
10/17/2016	Final preparation/edits to outline of Lehmann	Depositions	0.75
10/18/2016	Travel to and deposition of Steven Lehmann; debrief and strategy meeting with team	Depositions	7
10/18/2016	Debrief and strategy meeting after Lehmann deposition	Deposition	0.5
10/24/2016	T/c with SA re: Dyson kids' depositions	Depositions	0.2
10/24/2016	Prepare for deposition of Tawanda Dyson, Shabria Dyson and Lashanda Folkes: outline and pull exhibits	Depositions	5
10/24/2016	Review documents in preparation for Dyson and Folkes depositions	Depositions	2
10/25/2016	Final prep, travel to and take depositions of Tawanda Dyson and Lashanda Folkes	Depositions	6.75
10/27/2016	Review Tony Balkissoon's (TB) outline for Bagley dep	Depositions	0.2
10/28/2016	Review supplemental production from Defendants	Written Discovery	0.1
10/28/2016	Send and produce email from SA to Tawanda	Written Discovery	0.1
10/28/2016	Confer with team re: juvenile records	Written Discovery	0.2
10/28/2016	Review and edit interrogatory re: homicide file	Written Discovery	0.3
11/2/2016	T/c with SA re: case strategy and update on Defendant Goldstein; scheduling emails with o/c	Depositions	0.5
11/3/2016	Email and t/c with Mort Smith re: case investigation	Case Development	0.2
11/3/2016	Emails with team re: discovery disputes and homicide file; review email with o/c re: discovery disputes	Written Discovery	0.2
11/3/2016	Review Dorsey audio file	Case Development	1
11/3/2016	Review Shack deposition	Case Development	3
11/3/2016	Review homicide file and follow-up with questions and email to o/c asking to inspect file	Written Discovery	2
11/3/2016	Team discussion re: Rule 30(b)(6) deposition	Depositions	0.5
11/4/2016	Review documents produced in discovery	Case Development	7.75
11/4/2016	Team emails re: case strategy	Case Development	0.25
11/4/2016	T/c with SB re: case	Case Development	0.25
11/4/2016	Emails with o/c to schedule Palmere and Wagster	Depositions	0.2

11/4/2016	Review investigation plan	Case Development	1
11/4/2016	Prepare for Ritz deposition: review documents, create outline and identify possible exhibits	Depositions	7
11/6/2016	Create/print/copy deposition exhibits for Ritz deposition	Depositions	1
11/7/2016	Prep, travel to and take defendant deposition; debrief team, draft follow-up interrogatories	Written Discovery; Depositions	11.5
11/8/2016	Prepare for Goldstein deposition: Read Goldstein dep (part 1); print copies of exhibits previously marked; review docs; create/edit outline; pull new exhibits	Depositions	10
11/8/2016	Confer with team re: Patton/Neverdon	Depositions	0.5
11/9/2016	Final prep, travel to and take Goldstein deposition	Depositions	9
11/9/2016	Prepare for Weese deposition: read documents, outline exam and pull exhibits	Depositions	4
11/10/2016	Final prep, travel to and take deposition of Dale Weese	Depositions	9.5
11/11/2016	T/c with JL and SG re: Stine	Case Development	0.2
11/11/2016	Emails and follow-up from deposition re: amending the Complaint	Case Development	0.5
11/14/2016	Emails to team re: case strategy and investigation	Case Development	0.4
11/14/2016	Read and edit reply to keep Defendant depositions open	Motion Practice	0.2
11/14/2016	Research and draft motion to amend Complaint	Motion Practice	10.5
11/14/2016	Edit motion to release juvenile records	Motion Practice	0.1
11/15/2016	Edit motion to amend and amend Complaint to add new defendants; emails with team re: motion and discovery	Motion Practice	4.9
11/15/2016	Confer with team re: motion to amend and discovery	Motion Practice	1
11/16/2016	Finalize motion to amend/motion for leave to file redacted motion; emails with team re: Van Gelder	Motion Practice	0.5
11/16/2016	Emails with team re: Van Gelder	Case Development	0.1
11/17/2016	T/c with TK re: case	Case Development	0.25
11/17/2016	T/c with Michelle Nethercott re: Van Gelder	Case Development	0.25
11/17/2016	Emails with paralegal Caroline Hirst re: Van Gelder	Case Development	0.1

11/17/2016	Review Van Gelder testimony	Case Development	0.75
11/17/2016	Prep for and attend call with Court re: personnel file	Court Hearing	1.5
11/18/2016	Prepare for Van Gelder deposition: review documents and prepare outline of exam	Depositions	7.8
11/18/2016	Review documents produced in discovery and conduct follow-up research	Case Development	1.5
11/21/2016	Review emails and supplemental production by BPD	Case Development	1
11/21/2016	Request inspection of homicide file	Written Discovery	0.1
11/21/2016	Brainstorm with SG and TK re: case strategy	Case Development	1
11/28/2016	Travel to Baltimore and review homicide file; follow-up from review and compare files produced in discovery	Written Discovery	5
11/29/2016	Review documents in preparation for SB deposition prep	Depositions	3
11/29/2016	Travel to Baltimore and prep SB for deposition	Depositions	5.75
11/29/2016	Email to BPD re: homicide file	Written Discovery	0.75
11/30/2016	Review documents to prepare for SB deposition prep	Depositions	2
11/30/2016	Travel to Baltimore and prep SB for deposition	Depositions	6.25
11/30/2016	Call with Brian Murphy	Case Development	0.25
12/1/2016	Travel to Baltimore and defend SB deposition; debrief with team re: deposition	Depositions	10.5
12/2/2016	T/c with Niemeyer re: GSR	Written Discovery	0.75
12/5/2016	Emails with team re: case strategy and to-do list	Case Development	0.4
12/7/2016	Read response to motion to amend	Motion Practice	1.5
12/8/2016	T/c with TK re: motion to amend and follow-up research	Motion Practice	0.5
12/8/2016	Research and draft reply brief in support of motion to amend	Motion Practice	11.2
12/9/2016	Review Defendants' responses to Plaintiff's Second Set of Interrogatories	Written Discovery	0.4
	Edit reply brief in support of motion to amend, help pull exhibits and draft motion to seal	Motion Practice	5.8
12/11/2016	Edit outline for Van Gelder deposition and pull exhibits	Depositions	1.2
12/2/2016	Final prep, travel to and take deposition of Van Gelder	Depositions	10
12/14/2016	Email correspondence with team re: case strategy and to do list	Case Development	0.6

12/15/2016	Email to Joe Stine re: case	Case Development	0.1
12/15/2016	Marked SB deposition Confidential (read and highlight)	Depositions	3.9
12/19/2016	Review defendants' responses to discovery	Written Discovery	0.7
12/23/2016	Review Durham docs (FOIA: Rice)	Written Discovery	0.6
12/27/2016	Team call re: strategy and outstanding items	Case Development	0.5
12/28/2016	Review GJ motion	Motion Practice	0.4
1/2/2017	T/c with team re: experts and brainstorm	Written Discovery	0.6
1/2/2017	Review Defendants supplemental production re: DSS and brainstorm	Case Development	0.2
1/4/2017	T/c with TK and Sid Binks	Case Development	0.5
1/4/2017	T/c with Brian Murphy	Case Development	0.5
1/4/2017	Follow-up re: case investigation	Case Development	0.2
1/4/2017	T/c with o/c re: confidential designation of Burgess deposition and re-opening dep	Case Development	0.2
1/5/2017	Email correspondence with team re: case strategy and follow-up discovery	Case Development; Written Discovery	0.3
1/5/2017	T/c with TK re: SB writ	Case Development	0.5
1/6/2017	Review docs in preparation for Wagster and Meinhardt deposition; review email from o/c re: re-opening deps	Depositions	2.6
1/6/2017	Review email from o/c re: re-opening deps	Depositions	0.1
1/7/2017	T/c with TK re: case	Case Development	0.5
1/9/2017	Prep for Wagster and Meinhardt deps, create outline	Depositions	4.25
1/9/2017	Review discovery letter on BPD's interrogatory responses	Written Discovery	0.25
1/10/2017	Call with Brian Murphy and TK re: expert report and follow-up	Written Discovery; Depositions	0.5
1/10/2017	Travel to Baltimore and depose Wagster and Meinhardt	Depositions	7
1/11/2017	Synopsise and debrief team on Wagster and Meinhardt deps; edit letter to o/c re: re-opening deps	Depositions	0.3

1/12/2017	Review email re: re-opening deps	Depositions	0.1
1/13/2017	Emails re: re-deposition of defendants	Depositions	0.1
1/14/2017	T/c with SB re: exam; t/c with Dr. Binks re: evaluation	Written Discovery	0.2
1/17/2017	Draft Rule 30(b)(6) request	Depositions	1.4
1/17/2017	Email correspondence with team re: experts	Case Development	0.25
	Review interrogatory answers and Defendants' subpoena	Written Discovery	0.3
1/18/2017	Review emails re: scope of re-deposition	Depositions	0.2
1/19/2017	T/c with SB re: case	Case Development	0.2
1/19/2017	Edit Rule 30(b)(6) request and send out	Depositions	0.4
1/22/2017	Email correspondence with team re: additional discovery necessary and discovery extension	Written Discovery	0.3
1/23/2017	Debrief on Court ruling permitting amendment	Motion Practice	0.1
1/24/2017	Review and respond to emails re: extending expert discovery	Written Discovery	0.2
1/25/2017	Team meeting re: case strategy, serving new defendants, getting deps scheduled, etc.	Case Development	0.25
1/26/2017	Follow-up and send additional docs to GSR expert	Case Development	0.1
1/26/2017	Email and confer re: discovery schedule, deposition dates	Case Development	0.1
1/26/2017	Team meeting re: outstanding discovery	Case Development	0.4
1/27/2017	Review UMD records	Written Discovery	0.25
1/30/2017	Emails and t/c with Mort Smith (MS) re: investigation	Case Development	0.25
1/30/2017	Emails and confer re: discovery schedule, depositions	Case Development	0.2
1/31/2017	Research and review records	Written Discovery	0.6
2/2/2017	Communication with MS re: investigation	Case Development	0.25
2/3/2017	Brainstorm with SG re: expert report	Case Development	0.25
2/3/2017	Email and confer re: outstanding witnesses and contact info	Case Development	0.1
2/6/2017	Review BPD response to discovery letter on interrogatories	Written Discovery	0.1

2/10/2017	Review document requests	Written Discovery	0.1
2/10/2017	T/c with Kenneth Man	Case Development	0.2
2/10/2017	Email to o/c re: scheduling depositions	Depositions	0.2
2/13/2017	Follow-up on defendants' supplement to MD Parole Commission on Dorsey	Written Discovery	0.2
2/13/2017	Rsearch case law and draft response to discovery letter	Written Discovery	2.2
2/13/2017	Review evidence and claims to-date	Case Development	3
2/14/2017	T/c with o/c re: outstanding discovery	Written Discovery	0.75
2/14/2017	Research habit evidence	Case Development	1
2/14/2017	Review BPD's letter response	Written Discovery	0.25
2/15/2017	Review Rule 30(b)(6) in advance of call and conduct t/c with o/c	Written Discovery; Depositions	0.25
2/15/2017	Conduct additional research on habit evidence	Case Development	0.75
2/15/2017	Review Sewell file and other Howard Rice materials	Case Development	2.8
2/15/2017	F/u on investigative tasks	Case Development	0.75
2/16/2017	Edit letter to BPD re: outstanding discovery disputes; draft motion to compel	Written Discovery	0.4
2/16/2017	Draft motion to compel	Motion Practice	6
2/17/2017	Email with LL to help find Collins; emails with o/c and team re: deposition scheduling	Depositions	0.2
2/17/2017	T/c and emails with TK re: case	Case Development	0.5
2/18/2017	Draft motion to compel; pull exhibits for motion to compel	Motion Practice	8
2/21/2017	Review transcript from 1/23/17 hearing	Motion Practice	0.5
2/21/2017	Finish editing and file motion to compel	Motion Practice	2
2/22/2017	Debrief with TK on Mann dep	Depositions	0.2
2/23/2017	Review BPD motion to strike; draft response and file	Motion Practice	1.75

2/24/2017	Review chronology of Rice homicides	Case Development	0.5
2/27/2017	Emails with SG re: MPIA requests; email to BPD/research on MPIA	Written Discovery	1.5
2/27/2017	Prep for Miller deposition	Depositions	4
2/28/2017	Final prep, travel to and take deposition of Frank Miller; debrief on dep	Depositions	5
2/28/2017	Emails regarding outstanding discovery disputes	Written Discovery	0.2
2/28/2017	Research MPIA	Case Development	0.8
3/2/2017	Review production for docs re: Al Marcus	Depositions	1
3/2/2017	T/c with TK re: CAD	Case Development	0.25
3/8/2017	Travel to and inspect physical evidence at BPD; debrief email	Written Discovery	3.2
3/9/2017	T/c with o/c re: outstanding discovery	Case Development	0.25
3/9/2017	Review privilege log and Tayback file	Case Development	2.25
3/9/2017	T/c with SA re: files	Written Discovery	0.2
3/9/2017	Email to o/c re: Tayback waiver and scheduling deps	Case Development	0.1
3/9/2017	Research and draft letter to court re: discovery disputes;	Motion Practice	4
3/9/2017	Emails with team re: Howard Rice and files	Case Development	0.5
3/10/2017	Review Tayback documents	Written Discovery	0.2
3/10/2017	Edit letter to Court re: discovery dispute	Motion Practice	1.5
3/13/2017	Review Defendants' submissions to Court re: discovery dispute;	Motion Practice	0.5
3/13/2017	Email re: court hearing and discovery dispute	Motion Practice	0.1
3/13/2017	Review docs produced by BPD	Written Discovery	0.75
3/14/2017	Review Rice docs and TK summary of Rice docs and FOIA	Written Discovery	0.7
3/15/2017	Debrief from team re: court hearing	Case Development	0.1

3/15/2017	Draft response to Lehmann interrogatories	Written Discovery	1.25
3/15/2017	T/c with SB re: interrogatories	Written Discovery	0.25
3/16/2017	Email with o/c re: deposition scheduling	Depositions	0.1
3/17/2017	Read BPD letter correction	Written Discovery	0.1
3/17/2017	Edit and research answer to interrogatories	Written Discovery	0.8
3/17/2017	Confer with team re: Howard Rice Files	Written Discovery	0.3
3/21/2017	T/c with Shawn Armbrust; follow-up on origin of Tayback file	Written Discovery	1
3/22/2017	Prepare for depositions of Collins and Trawinski	Written Discovery; Depositions	2.4
3/22/2017	Edit interrogatory responses		0.2
3/24/2017	Review documents produced in discovery	Case Development	1.7
3/24/2017	t/c with o/c about Kilty and follow-up	Depositions	0.3
3/24/2017	Edit motion re: Howard Rice	Motion Practice	1
3/27/2017	T/c with Kilty	Case Development	0.5
3/27/2017	Prepare for depositions of Collins and Trawinski	Depositions	2
3/27/2017	Edit ainterrogatory responses and call with SB	Written Discovery	0.5
3/28/2017	Final prep, travel to and take depositions of Collins and Trawinski	Depositions	4.5
3/28/2017	Email team re: Tayback letter	Case Development	0.25
3/28/2017	Edit interrogatory response	Written Discovery	0.1
3/28/2017	Follow-up RFP for Crime Log	Written Discovery	0.2
3/28/2017	Email MS re: investigation	Case Development	0.1
4/3/2017	T/c with TK re: case	Case Development	0.25
4/3/2017	Review documents produced in discovery and Howard Rice materials	Written Discovery	1.6
4/3/2017	Email re: FBI Touhy request and follow-up on new defendant discovery requests	Written Discovery	0.1

4/4/2017	Emails with o/c re: Al Marcus/BPD 2407	Written Discovery	0.4
4/4/2017	Emails with Burgess team re: FBI reports		0.2
4/4/2017	Draft and edit discovery letter		0.8
4/5/2017	Review Rice summaries created by Sarah Pfander (SP) and LL	Written Discovery	0.5
4/5/2017	T/c with SA re: FBI Touhy request	Written Discovery	0.5
4/5/2017	Team emails re: outstanding deps	Depositions	0.2
4/7/2017	T/c with SB re: case	Case Development	0.5
4/9/2017	Follow-up with Dr. Binks re: case	Case Development	0.1
4/11/2017	T/c with Dr. Binks re: case and follow-up call with SG and TK re: Dr. Binks;	Case Development	1
4/11/2017	Review answers to Complaint by new defendants	Case Development	0.25
4/11/2017	Team emails re: "to-dos"	Case Development	0.2
4/12/2017	Email with o/c re: outstanding discovery responses; t/c with SG re: case	Written Discovery	0.3
4/13/2017	Email with team re: dead witnesses, Holmes deposition	Case Development	0.2
4/17/2017	Prep Tasha McFadden and follow-up from prep, including collecting and reviewing documents and responding to document subpoena	Depositions	1.75
4/18/2017	Final prep, travel to and defend deposition of Tasha McFadden; debrief team	Depositions	3
4/19/2017	Email to o/c with bates-stamped versions of McFadden subpoena response	Written Discovery	0.1
4/20/2017	T/c with SG and Tony G	Written Discovery	0.5
4/20/2017	Draft discovery letter to BPD	Written Discovery	0.5
4/20/2017	Draft and edit updated Rule 30(b)(6) notice	Written Discovery	0.5
4/20/2017	Emails with team re: outstanding discovery, including FBI subpoena	Case Development	0.1
4/21/2017	Emails with team and t/c with SA re: outstanding deps, case strategy, FBI subpoena;	Case Development	0.6
4/21/2017	Draft updated Rule 26(a)(1) witness list	Written Discovery	0.5

4/21/2017	Review discovery/docs relating to "Kevin," Shawn Taylor; email with BPD re: outstanding discovery	Written Discovery	0.75
4/21/2017	Review and draft emails and discovery letter re: outstanding discovery; review letter from BPD re: Howard Rice	Written Discovery	1.3
4/24/2017	T/c with BPD re: outstanding motion and follow-up email	Motion Practice	0.25
4/24/2017	Emails with team re: strategy on outstanding motion	Motion Practice	0.2
4/24/2017	Review defendants' response to motion; draft reply	Motion Practice	4.25
4/24/2017	Draft discovery	Motion Practice	1.5
4/25/2017	Edit reply brief	Motion Practice	1
4/25/2017	Edit discovery requests	Written Discovery	1.75
4/26/2017	Edit reply brief	Motion Practice	0.75
4/26/2017	Draft supplemental interrogatory response; emails with SG re: supplemental interrogatory response	Written Discovery	1.5
4/26/2017	Review declarations of Miller and Marcus	Written Discovery	0.1
4/26/2017	Email with team re: MPIA requests	Written Discovery	0.25
4/27/2017	Emails re: Ritz re-deposition	Depositions	0.1
4/28/2017	Email from BPD re: outstanding discovery; review	Written Discovery	0.1
5/3/2017	Read Lehmann dep	Depositions	2
5/4/2017	Review discovery relating to Lehmann	Depositions	0.5
5/4/2017	Edit letter re: MPIA requests	Written Discovery	0.1
5/5/2017	Emails with team re: Rule 30(b)(6) dep and Howard Rice;	Written Discovery; Depositions	0.25
5/5/2017	Review Rice docs and t/c with TK re: Rice docs	Written Discovery	1
5/6/2017	Review discovery responses of individual defendants	Written Discovery	0.8
5/8/2017	Prepare for Lehmann re-dep	Depositions	2
5/8/2017	Emails with team re: "Little Man" and Howard Rice;	Case Development	0.1

5/8/2017	Compare BPD interrogatories with documents BPD produced	Written Discovery	0.25
5/8/2017	Review documents produced in discovery	Case Development	0.5
5/9/2017	Final prep, travel to Baltimore and take re-deposition of Lehmann; debrief	Depositions	3.5
5/9/2017	Emails with team re: investigation strategy	Case Development	0.25
5/9/2017	Draft and edit Rule 30(b)(6) dep outline, pull exhibits	Depositions	6
5/9/2017	Compare MPIA and BPD-produced homicide file; review BPD discovery responses	Case Development	4
5/10/2017	Final prep, travel to Baltimore and take Rule 30(b)(6) deposition	Depositions	12
5/11/2017	Debrief team on Rule 30(b)(6)	Depositions	1
5/11/2017	Emails with team re: SB re-dep	Depositions	1
5/11/2017	Prep for Miles and Boyd depositions	Depositions	3.25
5/11/2017	Review 3/15/17 hearing transcript and emails re: hearing	Case Development	0.5
5/12/2017	Email with team re: investigative tasks and outstanding depositions	Case Development	0.4
5/12/2017	Court hearing regarding Rice motion and debrief team	Court Hearing	0.4
5/12/2017	Review discovery re: victim's children, Judge Doory and Tanya Thompson	Case Development	0.3
5/14/2017	Draft outline for Miles dep and edit outline	Depositions	3.75
5/15/2017	Final prep, travel to Baltimore and take deposition of Miles	Depositions	5
5/15/2017	Draft and edit outline for Boyd	Depositions	3.25
5/15/2017	Review FBI Touhy response and debrief on Touhy response with SA (t/c)	Written Discovery	4
5/16/2017	Final prep, travel to Baltimore and depose Boyd	Depositions	8
5/16/2017	Debrief on Miles and Boyd	Depositions	0.2
5/16/2017	Email to MS re: outstanding investigative tasks	Case Development	0.1
5/16/2017	Team call and emails re: outstanding to-do list/case strategy	Case Development	1
5/17/2017	Travel to Baltimore and review Rice files	Written Discovery	8
5/18/2017	Travel to Baltimore and review Rice files	Written Discovery	8
5/19/2017	Emails with team and debrief re: Rice files	Case Development	0.6
5/19/2017	Debrief from TB re: Skinner dep	Depositions	0.2

5/19/2017	Document review and MPIA request re: Kevin Don Williams	Written Discovery	0.3
5/20/2017	Email re: Sabein re-deposition; email re: discovery and newly identified witnesses	Depositions	0.2
5/22/2017	Read Goldstein depositions to prepare for re-dep	Depositions	2.2
5/22/2017	Review letter from Court and 12/1/16 hearing transcript	Case Development	0.2
5/23/2017	Emails with team and preparation for re-depositions of Purtell and Goldstein	Depositions	2.7
5/23/2017	Emails with team re: Patton and Neverdon re-deps	Depositions	0.1
5/24/2017	Final prep, travel to and re-depose Goldstein; debrief team on Goldstein	Depositions	4.5
5/24/2017	Review subpoena response from Georgetown	Written Discovery	0.5
5/25/2017	Draft letter to AG re: Judge Doory dep	Depositions	0.1
5/25/2017	Travel to Baltimore and review Rice files	Written Discovery	7
5/25/2017	Emails re: investigative tasks, outstanding depositions and Weese re-dep	Case Development	0.7
5/25/2017	Check-in on experts	Case Development	0.1
5/25/2017	T/c with SB re: status of case	Case Development	0.5
5/26/2017	Debrief on McAllister; review email from o/c re: SB re-dep and respond	Depositions	0.25
5/27/2017	T/c with SB re: status of case, Rice, FBI subpoena response	Case Development	0.75
5/29/2017	Review and debrief on Willis dep	Case Development	0.1
5/30/2017	Emails re: SB re-dep; emails with team re: case strategy, Pat Brooks and Troy Williams; ;	Case Development	0.7
5/30/2017	Research issue of SB re-dep and respond to o/c	Depositions	1.75
5/30/2017	T/c with Dwight Holmes	Case Development	0.25
5/30/2017	Edit spreadsheet of tabbed docs for BPD re: Rice files	Written Discovery	0.8
5/31/2017	Help prep for Patrice Brooks and Troy Williams depositions	Depositions	0.3
5/31/2017	T/c with Brian Murphy re: case	Case Development	0.75
5/31/2017	Emails with team re: SB re-dep, outstanding discovery/depositions; email with o/c re: SB re-dep	Depositions	0.6
5/31/2017	review MPIA responses	Written Discovery	0.1

6/1/2017	T/c with SA and emails with team re: FBI docs	Case Development	0.5
6/1/2017	Read SB dep/notes for re-dep prep	Depositions	5.5
6/1/2017	Research and draft letter to Court re: SB re-dep	Motion Practice	3.75
6/1/2017	T/c with Dan Goldbert re: Rice files and follow-up email	Written Discovery	0.5
6/1/2017	Debrief on Brooks dep	Depositions	0.1
6/2/2017	Travel to and prep SB for re-dep	Depositions	5
6/2/2017	T/c with SA re: SB re-dep	Depositions	0.25
6/2/2017	Edit letter to Court and file	Motion Practice	0.75
6/2/2017	Re-read defendants' May 4 interrogatories	Written Discovery	0.5
6/5/2017	Debrief on Troy Williams dep	Depositions	0.1
6/5/2017	Emails re: expert witnesses	Case Development	0.2
6/5/2017	Debrief re: t/c with Court	Case Development	0.2
6/6/2017	Review individual defendants' 4th Set of Interrogatory answers	Written Discovery	6.2
6/6/2017	T/c with Brian Murphy re: case and follow-up email with team	Written Discovery	1.5
6/6/2017	Emails re: Deputy Johnson deposition	Depositions	0.3
6/6/2017	Emails re: AG representation of Judge Doory	Depositions	0.1
6/6/2017	Prepare for Doory deposition and pull exhibits; research Rule 4-263	Depositions	4
6/7/2017	Final prep, travel to Baltimore and depose Judge Doory Debrief with team	Depositions	3.5
6/7/2017	Review Neverdon interrogatory answers	Written Discovery	0.2
6/7/2017	Emails with o/c re: Judge Doory and Osborne claim	Case Development	0.4
6/7/2017	Research Osborne, Skinner v. Switzer	Case Development	1
6/7/2017	Draft answers to old defendants' interrogatories	Written Discovery	6
6/8/2017	Edit draft interrogatories	Written Discovery	7.5
6/8/2017	Draft and edit responses to interrogatories from new defendants	Written Discovery	7
6/8/2017	Review discovery rule in effect at time of trial	Case Development	0.1

6/8/2017	Email with Brian Murphy re: case	Case Development	0.1
6/8/2017	Edit Rice synopsis	Case Development	0.3
6/12/2017	Emails with team re: Dr. Binks reports; edits to report	Case Development	0.5
6/13/2017	T/c with Dr. Binks re: report	Case Development	1
6/14/2017	Calls with SA and TB re: discovery schedule and follow-up email	Case Development	0.5
6/14/2017	Edit interrogatory responses	Written Discovery	2.75
6/15/2017	Edit interrogatory responses to new defendants; review interrogatories with SB	Written Discovery	5.75
6/16/2017	Edit interrogatory responses	Written Discovery	2.25
6/16/2017	Email to Niemeyer re: GSR	Case Development	0.1
6/16/2017	Review Binks report	Case Development	0.5
6/18/2017	Prepare to prep SB for re-dep	Depositions	1.5
6/19/2017	Travel to Baltimore and prep SB for re-dep	Depositions	5
6/19/2017	Emails with o/c re: scope of SB re-dep	Depositions	0.2
6/20/2017	Travel to and defend SB re-dep	Depositions	5
6/21/2017	Debrief on SB re-dep	Depositions	0.2
6/22/2017	T/c with Niemeyer and email follow-up re: GSR	Case Development	0.75
6/22/2017	Email and t/c with Brian Murphy	Case Development	1.1
6/22/2017	Review interrogatory responses re: medical treatment	Written Discovery	0.25
6/24/2017	Emails with team re: IME and psych data	Case Development	0.2
6/25/2017	T/c with SB re: IME; emails with team re: IME and form	Case Development	0.5
6/26/2017	T/c with Dr. Binks re: IME	Case Development	0.7
6/26/2017	T/c with SB re: IME	Case Development	0.3
6/26/2017	Review Murphy draft	Case Development	0.5
6/27/2017	T/c with Niemeyer	Case Development	0.5

6/27/2017	Review documents produced in discovery and Dyson dep	Case Development	5
6/27/2017	Emails with TK re: Brian Murphy report; edit Murphy report	Case Development	1.5
6/28/2017	T/c with Dr. Binks and edit Binks report; emails re: Dr. Binks report and edits	Case Development	1.75
6/28/2017	Review Niemeyer report	Case Development	1
6/28/2017	T/c with Brian Murphy re: report	Case Development	0.6
6/28/2017	Emails with team re: expert reports and Rice Synopsis	Case Development	0.7
6/29/2017	Emails with team re: expert reports	Case Development	0.75
6/29/2017	Edit Murphy report	Case Development	0.75
7/10/2017	Emails with team re: Dr. Binks; edit Stine report	Case Development	1.1
7/13/2017	Emails with team re: Dr. Binks, scheduling expert deps	Depositions	0.3
7/13/2017	Email with o/c re: IME	Case Development	0.1
7/13/2017	Edit Stine report	Case Development	1.3
7/14/2017	T/c with o/c re: IME and email follow-up	Case Development	0.3
7/14/2017	Emails with Brian Murphy re: dep	Case Development	0.1
7/19/2017	Emails with TB re: expert deps	Depositions	0.1
7/20/2017	Emails with team re: Dr. Binks dep and disclosure of underlying data	Depositions	0.1
7/27/2017	Emails with team re: scheduling deps	Depositions	0.2
7/31/2017	Review defendants' Rule 26(a)(2) disclosures; emails with team re: defendants' experts	Case Development	0.75
8/4/2017	Prep for Murphy dep, including conduct t/c with Brian Murphy re: dep; follow-up from t/c with Murphy re: fact research and doc review	Depositions	2.25
8/4/2017	Read Williams (expert) report and follow-up emails with team	Case Development	1.4
8/6/2017	Prep for t/c with Stine and email Stine re: case	Depositions	1
8/7/2017	Prep for and conduct t/c with TB and Joe Stine re: dep prep	Depositions	2.5
8/7/2017	Prep for and conduct t/c with TB and TK re: Binks dep prep	Depositions	1

8/7/2017	Review Sewell homicide file	Case Development	1
8/8/2017	Emails with team re: Stine dep and strategy	Depositions	0.5
8/8/2017	Email with o/c re: expert deps	Depositions	0.1
8/19/2017	Final prep, travel to and defend Murphy dep	Depositions	8.5
8/20/2017	Debrief on Murphy dep; email with team	Depositions	0.1
8/17/2017	Emails with SA & TK re: experts	Case Development	0.25
8/17/2017	Research discoverability of expert materials	Case Development	1
8/18/2017	Draft RTA.	Written Discovery	2.75
8/18/2017	T/c with TK re: deposition and email follow-up	Depositions	0.25
8/22/2017	Emails with team re: scheduling deps and possible rebuttal reports; t/c with SA and SB re: rebuttal	Depositions; Case Development	0.5
8/23/2017	Read Gaut report and follow-up emails to team re: strategy	Case Development	1.25
8/23/2017	Review documents produced in discovery and via subpoena re: FBI	Case Development	1
8/23/2017	Edit RTAs	Written Discovery	0.75
8/23/2017	Edit response to Kilty subpoena	Written Discovery	0.25
8/24/2017	Draft additional RTA and edit to cut to 30	Written Discovery	2.5
8/24/2017	Team call on experts and emails with team re: Kilty subpoena response	Case Development	1.5
8/24/2017	Review and determine whether need to update interrogatory response	Written Discovery	4
8/24/2017	Review Culotta addition	Case Development	0.1
8/24/2017	Research on GSR	Case Development	0.5
8/27/2017	Review TB Kilty dep outline and help prep for Kilty dep;	Depositions	1.5
8/27/2017	Review psych issues/experts and emails	Case Development	0.5
8/28/2017	Email with Stine re: rebuttal	Case Development	0.1
8/28/2017	T/c with Dr. Binks	Case Development	1
8/28/2017	edit and finalize interrogatory supplements and RTAs	Written Discovery	4.8

8/28/2017	Emails with TB re: Kilty dep	Case Development	0.3
8/29/2017	T/c with Stine re: Gaut	Depositions	0.5
8/29/2017	Edit Knox dep outline	Depositions	0.4
8/30/2017	T/c re: decoding FBI docs	Case Development	0.5
8/30/2017	T/c with SB re: case	Case Development	0.5
8/30/2017	Debrief and email with team re: Knox dep	Case Development	0.2
8/31/2017	Review Stine supplement and email with Stine re: finalizing it	Case Development	1.4
8/31/2017	Emails with team re: rebuttals	Case Development	0.2
8/31/2017	Review Dr. Binks report and follow-up emails with team	Case Development	0.8
9/1/2017	T/c with TK re: Gaut dep	Case Development	0.5
9/1/2017	Emails with TB and Dr. Binks re: Binks report; final review of Binks' report	Case Development	2.5
9/1/2017	Draft Rule 26(a)(2) disclosure, finalize reports	Case Development	1
9/1/2017	Debrief on Williams dep	Depositions	0.1
9/4/2017	Emails with team and research re: GSR	Written Discovery	0.25
9/4/2017	Review defendant Palmere, Boyd, Miles, Skinner discovery responses	Depositions	1
9/4/2017	Emails and brainstorming re: Defendants' Rule 26(a)(1) supplementation	Case Development	1
9/4/2017	Brainstorm motions in limine (MIL)	Trial Preparation	0.25
9/6/2017	Research and emails with team re: Gaut dep	Depositions	0.4
9/7/2017	Edit RTA responses; research fact issues in connection with RTA	Written Discovery	0.75
9/11/2017	Edit RTA	Written Discovery	1.5
9/11/2017	Emails re: defendants filing SJ and setting briefing schedule	Trial Preparation	0.5
9/18/2017	Read SJ briefs, start brainstorming responses	Motion Practice	8
9/19/2017	Brainstorming and research/doc review re: SJ, review deps, review briefs	Motion Practice	8.5

9/20/2017	Research fact and legal issues and review documents to prepare to respond to SJ	Motion Practice	8.5
9/20/2017	T/c with team to divide up SJ and follow-up emails	Motion Practice	0.25
9/21/2017	Re-read deps and research legal issues for SJ response	Motion Practice	9.75
9/21/2017	Emails with team re: FBI docs	Case Development	0.2
9/22/2017	Research legal issues and review documents and depositions for SJ response	Motion Practice	10.25
9/22/2017	Emails with TK re: Howard Rice	Case Development	0.2
9/23/2017	Read deps for SJ	Motion Practice	8
9/24/2017	Read deps and research legal issues for SJ response	Motion Practice	4
9/25/2017	Read deps, review documents and conduct legal research for SJ	Motion Practice	10
9/25/2017	T/c with SB re: case	Case Development	0.25
9/25/2017	T/c with TK re: SJ; t/c with TK re: Touhy	Motion Practice	0.5
9/26/2017	Read deps, review documents and conduct legal research for SJ; start outlining response	Motion Practice	10
9/27/2017	Read deps, review documents and conduct legal research for SJ; outline response	Motion Practice	12.5
9/28/2017	Research case law, review documents and edit outline of fact section of SJ response ; research case law; review motion to suppress testimony	Motion Practice	11
9/28/2017	Emails with team: edits and supplements to draft outline	Motion Practice	0.6
9/29/2017	Review discovery, expert reports and documents; draft fact section of SJ response brief	Motion Practice	10.8
9/29/2017	Emails with team re: facts in SJ brief	Motion Practice	0.1
9/30/2017	Draft fact section of SJ brief	Motion Practice	12
10/1/2017	Draft fact section of SJ brief	Motion Practice	4
10/2/2017	Review documents, conduct legal research and draft fact section of SJ brief	Motion Practice	13
10/2/2017	Emails with team re: SJ brief	Motion Practice	0.3

10/3/2017	Draft fact section of SJ brief; research legal issues	Motion Practice	12
10/4/2017	T/c with SA and JL re: trial date and case strategy	Motion Practice	0.5
10/4/2017	Research legal issues and draft fact/legal section of SJ brief	Motion Practice	13
10/5/2017	Edit proposed status	Motion Practice	0.1
10/5/2017	Research legal issues and draft legal section of SJ brief (Brady)	Motion Practice	12
10/6/2017	Review cites for LL re: fact section of SJ brief;	Motion Practice	0.5
10/6/2017	Draft and research Brady and fabrication sections of brief	Motion Practice	12
10/6/2017	Incorporate suggestions for brief from TB/TK	Motion Practice	0.5
10/7/2017	Incorporate edits from team into brief re: <i>Brady</i> section	Motion Practice	2
10/7/2017	Research legal issues and draft legal section of brief--failure to intervene, malicious prosecution and Maryland Declaration of Human Rights	Motion Practice	8
10/7/2017	Emails with team re: SJ brief	Motion Practice	1.2
10/8/2017	Draft SJ brief, including incorporate and edit brief and find fact and legal cites missing from brief	Motion Practice	14.2
10/8/2017	Emails with team re: SJ brief	Motion Practice	1
10/9/2017	Edit and finalize brief, including finding cites, drafting and editing introduction, proofread; edit exhibit list; edit motions to file instanter and under seal	Motion Practice	18
10/11/2017	T/c with Mort Smith	Case Development	0.2
10/11/2017	Draft Muhammad declaration	Case Development	0.4
10/11/2017	Draft for motion for leave to supplement	Motion Practice	1
10/11/2017	Read response to motion to supplement	Motion Practice	0.25
10/12/2017	Draft FPTO	Trial Preparation	0.5
10/12/2017	Brainstorm stipulations and MIL ideas	Trial Preparation	1

10/12/2017	Draft reply in support of motion to supplement	Motion Practice	2.5
10/12/2017	Read surreply	Motion Practice	0.75
10/13/2017	Prepare for and attend court hearing	Court hearing	0.5
10/15/2017	Draft FPTO; identify MILs to file; identify witnesses to call and get under subpoena	Trial Preparation	2
10/16/2017	Draft FPTO and review exhibits	Trial Preparation	2
10/16/2017	Brainstorm MIL	Trial Preparation	0.75
10/16/2017	Review subpoenas and cover letter;	Trial Preparation	0.1
10/16/2017	Emails with o/c re: scheduling Muhamad dep	Depositions	0.2
10/16/2017	Draft proposed stipulations	Trial Preparation	0.75
10/16/2017	Emails with TK re: Gaut Daubert brief	Trial Preparation	0.1
10/16/2017	Review and edit letter re: RTA	Written Discovery	0.25
10/17/2017	Edit FPTO and review exhibits for trial; divvy up witnesses to contact and get under subpoena	Trial Preparation	6
10/17/2017	Respond re: punitive damages	Trial Preparation	0.25
10/17/2017	T/c with o/c re: trial and debrief with team	Trial Preparation	0.5
10/17/2017	Draft MIL	Trial Preparation	3
10/17/2017	Team call re: trial prep	Trial Preparation	0.3
10/18/2017	Review exhibits	Trial Preparation	9
10/18/2017	Edit stipulations		0.1
10/18/2017	Edit FPTO and exhibits to FPTO; emails with JL and SA re: FPTO and MILs		4
10/18/2017	Help with witness subpoenas		0.2
10/18/2017	T/c with SB re: case	Case Development	0.5
10/19/2017	Draft and edit MILs; t/c with o/c re: trial and debrief team; edit exhibit list	Trial Preparation	6
10/19/2017	T/c with o/c re: trial and debrief team	Trial Preparation	0.75

10/19/2017	Edit exhibit list and FPTO (witnesses) and email with o/c re: FPTO	Trial Preparation	8
10/20/2017	Review defendants' expert disclosures	Trial Preparation	1
10/20/2017	Confer with team on Dorsey	Trial Preparation	0.3
10/20/2017	Draft and edit MILs on priors, drugs, no factual foundation, due diligence, FBI reports, homicide files	Trial Preparation	7
10/20/2017	Edit exhibit list and FPTO (witnesses) and email with o/c re: FPTO	Trial Preparation	3
10/20/2017	Draft motion to bar experts disclosed under Rule 26(a)(2)(c)	Trial Preparation	2
10/20/2017	Reach out to experts to schedule trial preparation	Trial Preparation	0.2
10/21/2017	Read Defendants MIL; divvy up	Trial Preparation	3
10/22/2017	Research responses to Defendants MIL/Daubert; email with TK re: Stine Daubert	Trial Preparation	4
10/22/2017	Discussion with TK re: prepping witnesses	Trial Preparation	0.75
10/23/2017	Research case law for responses to Defendants MIL/Daubert; draft responses	Trial Preparation	6
10/24/2017	Draft responses to MIL/Daubert; read Defendants SJ reply; trial prep	Trial Preparation	5
10/24/2017	Read Defendants SJ reply	Motion Practice	2
10/24/2017	Trial preparaton	Trial Preparation	3
10/25/2017	Prepare for SJ oral argumentm, including review caselaw, SJ exhibits and discuss with team	Motion Practice	12
10/26/2017	Drive and particpate in oral argument re: SJ; debrief team	Motion Practice	9.5
10/26/2017	Draft MIL responses	Trial Preparation	1.75
10/26/2017	Emails with team re: trial prep	Trial Preparation	0.5
10/27/2017	Draft, edit and finalize MIL responses	Trial Preparation	3.5
10/27/2017	Prep for SB trial testimony preparation, including review discovery and outline themes	Trial Preparation	2
10/27/2017	Travel to and prepare SB for trial testimony	Trial Preparation	8

10/27/2017	T/c with TK re: case	Trial Preparation	1
10/28/2017	Prepare for meeting with SB re: trial testimony	Trial Preparation	2
10/28/2017	Travel to and prepare SB for testimony	Trial Preparation	7.5
10/28/2017	Trial preparation: review docs, draft outline of exam for SB, answer team questions, work on FPTO/exhibits, read deps	Trial Preparation	4
10/28/2017	T/c with TK re: SB testimony	Trial Preparation	0.5
10/29/2017	Review FPTO, edit/add objections and exhibits	Trial Preparation	2.25
10/29/2017	Help identify designations	Trial Preparation	1
10/29/2017	Trial preparation: work on exams, read documents, review SB prison file	Trial Preparation	8
10/29/2017	Emails with team and o/c re: trial	Trial Preparation	0.2
10/30/2017	T/c with Joe Stine re: trial	Trial Preparation	0.25
10/30/2017	T/c with TK and JL re: trial	Trial Preparation	0.25
10/30/2017	Travel to Baltimore and prep SB for trial; prep for trial:	Trial Preparation	7
10/30/2017	Confer with JL (t/c) and team (emails) re: trial	Trial Preparation	0.5
10/30/2017	Trial prep: help with exhibits, read deps, continue drafting exam for SB; edit FPTO; review documents	Trial Preparation	5
10/30/2017	Emails with o/c re: trial	Trial Preparation	0.1
10/31/2017	Prep for trial: outlines, stips, prep for FPTC, review docs	Trial Preparation	4
10/31/2017	Travel to Baltimore and prep SB for trial	Trial Preparation	6
10/31/2017	Review SJ order	Trial Preparation	0.5
10/31/2017	Prep Shawn Armbrust	Trial Preparation	1
10/31/2017	T/c with team re: FPTC	Trial Preparation	0.25
10/31/2017	Emails with o/c and t/c with o/c re: trial	Trial Preparation	0.25

11/1/2017	Prep for pretrial conference;	Trial Preparation	2
11/1/2017	Travel to and participate in pretrial conference	Trial Preparation	5
11/1/2017	Trial preparation: draft witness outlines, review proposed stipulations; cull exhibits	Trial Preparation	5
11/2/2017	Draft SB and witness exams	Trial Preparation	3
11/2/2017	Travel to Baltimore and prep SB	Trial Preparation	6
11/2/2017	Research on jury pool	Trial Preparation	0.75
11/2/2017	T/c and emails with team re: trial strategy	Trial Preparation	1.25
11/2/2017	T/c with Tanya Thompson	Trial Preparation	0.25
11/2/2017	Edit proposed voir dire	Trial Preparation	0.1
11/3/2017	Travel to Baltimore and prep SB for trial with JL	Trial Preparation	5.5
11/3/2017	Edit and draft exams	Trial Preparation	7
11/3/2017	Emails with team re: trial strategy	Trial Preparation	1
11/4/2017	Edit SB exam; draft potential cross of SB; travel to Baltimore and prep SB with JL	Trial Preparation	11
11/5/2017	Travel to Baltimore and meet with Tasha and Sabria	Trial Preparation	1.75
11/5/2017	Draft witness outlines	Trial Preparation	2.25
11/5/2017	Research privilege issue re: Armbrust exam	Trial Preparation	1
11/5/2017	Review MIL, exhibits to prep for trial	Trial Preparation	2
11/5/2017	Emails with team re: witnesses and strategy	Trial Preparation	0.75
11/6/2017	Trial day and debrief	Trial	8
11/6/2017	T/c with Shawn Armbrust to prep for testimony; edit exam	Trial	2.5
11/6/2017	T/c with SB re: trial and case	Trial	0.5
11/6/2017	Edit stipulations and emails re: stipulations and trial	Trial	0.5
11/7/2017	Prepare for court--check in with MS, emails with team re: Dorsey, review GSR/DVG stip, review edited FPTO	Trial	1.75
11/7/2017	Trial day and debrief	Trial	8

11/7/2017	Discussion re: witnesses with TK and TB+B584	Trial	1
11/7/2017	Review and edit witness exams	Trial	1.25
11/7/2017	Draft stipulations on files	Trial	0.5
11/7/2017	Read Patrice Brooks deposition	Trial	0.5
11/8/2017	Prepare for court and attend trial	Trial	12.25
11/8/2017	Edit stipulations and draft stipulations	Trial	0.25
11/8/2017	Meet with witness, coordinate witnesses		0.75
11/9/2017	Prepare four court - designation re: Tayback testimony; trial day and debrief	Trial	1
11/9/2017	Trial day and debrief	Trial	8.5
11/10/2017	Draft stipulation on CAD	Trial	1
11/10/2017	Review reports and depositions of expert witnesses	Trial	5
11/10/2017	Draft Binks outline	Trial	2
11/10/2017	T/c and emails with experts for trial prep	Trial	1.25
11/10/2017	Email with team re: trial and witnesses, proposed stipulations	Trial	1.25
11/11/2017	Draft and edit trial exams	Trial	2.5
11/11/2017	Draft exam and meet with Tasha McFadden to prep for testimony	Trial	5
11/11/2017	Email correspondence with team re: trial	Trial	1.25
11/11/2017	Review documents, including Sewell files (BCSAO, BPD)	Trial	2
11/11/2017	Edit stips and email with o/c re: stips	Trial	0.5
11/12/2017	Draft Binks exam, meet with and prep Dr. Binks	Trial	4
11/12/2017	Re-read Stine dep and expert report, and prep Stine; follow-up emails with Stine	Trial	3.2
11/12/2017	Confer with team re: trial and witnesses	Trial	0.75
11/12/2017	Witness prep	Trial	0.75
11/12/2017	Edit stipulations and email to o/c	Trial	0.5
11/13/2017	Trial day and debrief	Trial	9
11/13/2017	Call to prep Dr. Binks and edit exam	Trial	1.75
11/13/2017	Meet with Brian Rainey and Tawanda Dyson	Trial	1.25
11/13/2017	Email with team re: trial; follow-up on issues re: witnesses	Trial	1.4
11/14/2017	Prep for court - review docs, witnesses	Trial	0.5
11/14/2017	Trial day and debrief	Trial	9
11/14/2017	Review Goldstein testimony for JL	Trial	1.5
11/14/2017	T/c with Dwight Holmes	Trial	0.25
11/14/2017	Draft Fowler stip	Trial	0.5
11/14/2017	Edit exams	Trial	0.5
11/14/2017	Emails with team re: trial	Trial	0.4
11/15/2017	Review Tawanda outline	Trial	0.2
11/15/2017	Trial day and debrief	Trial	8.5
11/15/2017	Prep with Dr. Binks	Trial	1.25
11/15/2017	Email correspondence with experts and team	Trial	1.5

11/15/2017	Draft proposed stipulations	Trial	0.6
11/15/2017	T/c with Tasha	Trial	0.1
11/16/2017	Prep for court - edit outline, meet up with Binks	Trial	0.5
11/16/2017	Trial day and debrief;	Trial	9
11/16/2017	Email correspondence with team re: trial	Trial	0.5
11/16/2017	Review DSS records, Brokaw dep; and Writ and exhibits to Writ	Trial	2.5
11/17/2017	Trial day and debrief	Trial	9
11/18/2017	Review jury instructinos	Trial	2
11/18/2017	Draft additional stipulations: McLarney, Palmere, Purtell, Holmes, Taylor, Dorsey parole	Trial	3
11/18/2017	Email correspondence with team	Trial	1.25
11/18/2017	Review transcript for redactions	Trial	1.75
11/19/2017	Draft Rule 50 motion re: FBI docs	Trial	3
11/19/2017	Edit stipulations	Trial	2.75
11/19/2017	Edit jury instructions	Trial	1
11/19/2017	Email communication with team re: stipulations, jury instructions, witnesses	Trial	1.6
11/19/2017	Review redactions and email with o/c re: redactions	Trial	0.2
11/19/2017	Prep Tasha and edit exam down to 30 minutes	Trial	0.75
11/19/2017	Send notes for closing to JL, help with demonstratives	Trial	1
11/20/2017	Prep for trial: edit stipulations and response to Rule 50 (Lehmann)	Trial	1
11/20/2017	Trial day, Rule 50 and jury instruction conference	Trial	10
11/20/2017	Prep for jury instruction conference	Trial	1
11/20/2017	Edit stipulations	Trial	0.5
11/20/2017	Edit jury instructions and email with o/c re: jury instructions	Trial	0.3
11/20/2017	Confer with team re: closings, demonstratives, final stips	Trial	1
11/21/2017	Prep for court - review defendants proposed jury instruction and research issue	Trial	0.75
11/21/2016	Trial day; verdict	Trial	7
11/28/2017	Email to team to collect hours	Post-trial	0.1
11/30/2017	Draft memorandum to re-open <i>Monell</i> discovery; edit joint motion to extend deadlines for fee petition	Post-trial	0.6
12/1/2017	Edit motion to re-open <i>Monell</i>	Post-trial	0.5
12/20/2017	Review Defendant Goldstein's Rule 50/59 motion	Post-trial	2.5
12/28/2017	Emails re: schedule for fee petition/costs both with o/c and internal with team	Post-trial	0.1
1/2/2018	edit motion to extend post-trial motion; t/c with o/c re: post-trial motion, fees and costs; emails with o/c and with team re: fees/costs	Post-trial	0.6
1/3/2018	Edit joint motion to stay fee petition	Post-trial	0.1

1/18/2018	Research for post-trial motion; review post-conviction hearing testimony	Post-trial	4
1/26/2018	Edit post-trial motion	Post-trial	2.5
3/12/2018	Review order on Rule 50/59; t/c with SB re: status of case	Post-trial	1
4/5/2018	Review and debrief email from o/c re: appeal	Post-trial	0.6
4/11/2018	Review defendants' letter re: appeal	Post-trial	0.1
4/12/2018	Emails with team re: response to defendants' letter	Post-trial	0.1
4/16/2018	Emails with o/c and with team re: briefing schedule for appeal	Post-trial	0.2
4/17/2018	Edit TB objection to defendants' docketing statement	Post-trial	0.2
4/27/2018	Review BPD request for conference; t/c with SB re: status of case	Post-trial	0.75
4/28/2018	Review BPD supplemental request for conference	Post-trial	0.2
4/30/2018	T/c with JL re: mediation; t/c with SB re: mediation; email correspondence with team re: BPD's request for conference	Post-trial	1.25
5/1/2018	Mediation	Post-trial	0.5
5/2/2018	Email correspondence re: call with court; draft short paragraph re: judgment	Post-trial	1
6/7/2018	Review Goldstein's appendix submission; email with team re: appendix for appeal	Post-trial	1.5
6/12/2018	Review additions to appendix submission; email with TB and TK re: appendix for appeal	Post-trial	1
6/25/2018	Emails with team re: jurisdiction	Post-trial	0.25
7/3/2018	Read Goldstein's brief; send copy to SB	Post-trial	3.2
7/11/2018	T/c with team re: strategy for Burgess appeal	Post-trial	1
9/26/2018	Review appellate materials - Goldstein brief, Rule 50/59 motions	Post-trial	4
10/2/2018	Research for appeal (hearsay issue)	Post-trial	2
10/12/2018	Research hearsay issue	Post-trial	0.8
10/15/2018	Review hearsay case law	Post-trial	0.4
10/16/2018	Review caselaw on notice	Post-trial	0.6
10/17/2018	Review jury instructions for appeal	Post-trial	0.9
10/21/2018	Review appendix; help fill in cites on brief	Post-trial	1.5
10/22/2018	Edit brief, help find cites for brief	Post-trial	5.8
10/22/2018	T/c with JL and TB re: appellate brief	Post-trial	0.4
10/22/2018	Email correspondence with team re: appellate brief	Post-trial	0.2
10/22/2018	Edit and review supplemental appendix	Post-trial	0.2
12/6/2018	Review reply on appeal	Post-trial	1.25
1/28/2019	Email correspondence with team re: appellate jurisdiction	Post-trial	0.2
1/29/2019	T/c with SB re: appellate argument	Post-trial	0.1
1/30/2019	Travel to and attend appellate argument	Post-trial	2

1/30/2019	Propose Rule 28j letter on general versus special verdict and emails re: 28j	Post-trial	0.5
1/30/2019	Research <i>Lewis</i> case	Post-trial	0.5
1/31/2019	Edit Rule 28(j) letter	Post-trial	0.1
2/27/2019	Review court order and email correspondence with team	Post-trial	0.1
3/6/2019	T/c with TK, SA and JL re: supplemental briefing; email correspondence with TK re: draft of supplemental brief	Post-trial	1
3/8/2019	Edit supplemental brief; email with TK re: strategy on supplemental brief	Post-trial	0.7
3/11/2019	Edit second draft of supplemental brief	Post-trial	1.25
4/2/2019	Review 4th Circuit order; t/c SB re: status update	Post-trial	0.25
4/5/2019	Review motion to dismiss (BPD); email correspondence with team re: response to MTD	Motion Practice	0.4
4/26/2019	Edit response to BPD MTD	Motion Practice	0.4
5/31/2019	Review order on MTD	Motion Practice	0.2
7/15/2019	Review 4th Circuit Joint Appendix; identify additions to the Joint Appendix	Post-trial	2.3
7/16/2019	Review response by BPD to schedule for attorneys' fees, draft reply	Post-trial	2.5
7/18/2019	Read defendants depositions for support for <i>Monell</i> claim	Post-trial	1.75
7/22/2019	Edit and finalize additions to the Joint Appendix	Post-trial	1.4
8/7/2019	Email with o/c re: Joint Appendix; t/c with SA re: Joint Appendix	Post-trial	0.3
8/30/2019	T/c with TK and JL re: strategy for appellate brief	Post-trial	0.2
10/2/2019	Review jury instructions/review brief; email correspondence with team re: <i>Monell</i> cross-appeal; look for cites	Post-trial	3.2
12/9/2020	Help prep for oral argument - review briefs, Joint Appendix; find cites	Post-trial	4
12/10/2020	Help prep--provide questions, answers for potential questions	Post-trial	1
5/14/2021	Read 4th Circuit opinion; call SB with update	Post-trial	1
6/22/2021	Emails with SA and JL re: filing fee petition deadline	Fee Petition	0.1
6/25/2021	Edit motion for fees and costs	Fee Petition	0.3
7/8/2021	Call with SB re: case	Case Development	0.5
8/16/2021	Review costs for case	Fee Petition	1
8/17/2021	Edit costs spreadsheet	Fee Petition	0.25
8/24/2021	T/c with SA and JL re: fees and costs	Fee Petition	0.25

8/26/2021	Emails with AT re: payment for SB and email with o/c re: extension on fee petition	Case Development; Fee Petition	0.2
8/27/2021	Edit motion to extend fees/costs and file	Fee Petition	0.2
10/25/2021	Review Local Rules, Appendix B, emails with team and with Kobie Flowers re: fee petition	Fee Petition	0.2
10/26/2021	Emails with TB and SG re: fee petition, draft affidavits	Fee Petition	0.3
10/28/2021	Edit and draft petition; edit and cull exhibits	Fee Petition	8
10/29/2021	Edit and draft petition; edit and cull exhibits	Fee Petition	5
		TOTAL	1474

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Date	Description	Category	Time
3/22/15	Reviewing Gayle Horn's (GH) draft complaint; emailing with GH re same	Pleadings	2.5
3/23/15	T/c w GH re complaint	Pleadings	0.2
3/24/15	Emails with Lauren Leбата (LL) and GH re: PHV application and serving the Defendants	Case Development	0.2
3/25/15	Emails with LL and GH re refiling PHV application	Case Development	0.2
3/26/15	Reviewing case file in preparation for litigation	Case Development	3.5
3/30/15	Emails re: service of summons and Complaint with LL, GH	Case Development	0.1
4/6/15	Emails with LL and GH re: service on Defendants Weese, Lehman, Van Gelder and Purtell	Case Development	0.2
4/13/15	Emails with LL and GH re: service on Defendant Ritz; research on Ritz to identify if alive and if so, where living	Case Development	0.5
4/20/15	Follow-up emails with Melinda Ek (ME), SG and LL re: Sabein Burgess (SB) probation status and network folder	Case Development	0.1
4/21/15	Emails with LL and GH re: service	Case Development	0.2
4/24/15	Corresponding with OC re about service on individual defendants and dates for responsive pleadings	Case Development	0.3
4/30/15	Email correspondence among OC and with LL and GH re: service	Case Development	0.1
5/5/15	Email w OC re: service on Goldstein, Neverdon and Ritz	Case Development	0.2
5/6/15	Email w OC re: service on Goldstein, Neverdon and Ritz	Case Development	0.3
6/8/15	Review motions to dismiss (MTD) filed	Motion Practice	2
6/9/15	Emails w summary associates re MTD briefing	Motion Practice	0.1
6/10/15	Research for MTD response re judicial estoppel		0.5
6/11/15	Emails with GH and summer associate re: Notice of Claim	Motion Practice	0.1
6/15/15	Emails w GH re motion to extend MTD response deadline		0.1
6/15/15	Research for MTD response re BPD as state agency, notice of claim, Monell		1
	Drafting and filing motion to extend MTD response deadline		0.75
7/1/15	Emails with GH re: strategy for MTD response	Motion Practice	0.5
7/1/15	Research and drafting MTD response		7
7/2/15	Drafting MTD response; drafting motion for leave to file consolidated response		6.5
7/5/15	Research and drafting/editing MTD response		5.3
7/6/15	Research and drafting/editing MTD response	Motion Practice	8.5
7/6/15	Finalizing and filing motion re consolidated response and additional pages	Motion Practice	0.2
7/9/15	Research and drafting/finalizing/filing MTD response	Motion Practice	2.25
8/17/15	Read Defendants' replies to MTD	Motion Practice	2
10/14/15	Drafting letter to OC re start of discovery corresponding with GH re same	Written Discovery	0.75
11/3/15	Corresponding with OC re Rule 26(f) conference and start of discovery	Written Discovery	0.1
11/10/15	Corresponding with OC re Rule 26(f) conference and start of discovery	Written Discovery	0.1
11/19/15	Reading correspondence from OC, drafting responsive letter, sending same re start of discovery	Written Discovery	0.5
1/14/16	Reviewing case reassignment order, research on new judge	Case Development	0.1
2/1/16	Correspondence w GH re amending complaint	Case Development	0.2
3/1/16	Review order on MTD; email with LL and SA to follow up	Case Development	1.5
3/7/16	T/c with GH re: Burgess, discovery planning	Case Development	0.75
3/11/16	Correspondence w GH re start of discovery/scheduling order	Written Discovery	0.2
3/15/16	Review bifurcation motion; review answers	Motion Practice	1
3/16/16	Correspondence w GH re court call	Motion Practice	0.2

		Motion Practice; Court Hearing; Case Development	
3/23/16	Court hearing on bifurcation; follow-up with GH on scheduling and to do list; corresponding with experts		3.25
3/23/16	Review Judge's Order on bifurcation	Motion Practice	0.2
3/24/16	Review Judge's scheduling order	Motion Practice	0.2
3/24/16	Call w client re case update and discovery	Case Development	0.5
3/26/16	Corresponding with experts and Tess Kleinhaus (TK) re experts	Case Development	0.25
3/26/16	Correspondence w Sarah Grusin (SG), TK, GH re initial outgoing written discovery	Written Discovery	0.3
3/28/16	Emails with TK and GH on GSR expert	Case Development	0.1
3/29/16	Reviewing draft written discovery and meeting with SG and TK re same	Written Discovery	0.5
3/30/16	Meeting w TK and SG re deposition plan	Written and Oral Discovery	0.5
3/30/16	Correspondence w team re documents from post-conviction counsel	Written Discovery	0.1
3/31/16	Correspondence w team re public records requests	Written Discovery	0.5
4/1/16	Correspondence w OC about discovery to individual Defendants and BPD		
4/13/16	Reviewing public records requests	Written Discovery	0.25
4/13/16	Reviewing individual Defendants' discovery requests	Written Discovery	0.5
4/14/16	Emails with GH, TK and SG re: prosecutor	Case Development	0.4
4/14/16	Team meeting re scheduling order, initial status report, scheduling depositions	Case Development	0.75
4/19/16	Reviewing Sarah Pfander (SP) document index; meeting with SG and TK	Case Development	0.5
4/27/16	Team meeting re status report and discovery; correspondence with TK and SG about meeting Brian Rainey	Case Development	0.75
4/27/16	Drafting joint status report; correspondence with TK and SG re same; correspondence with OC re same	Written Discovery	1
4/28/16	Reviewing defendants' changes to joint status and correspondence w OC re same	Written Discovery	0.5
5/2/16	Finalizing and filing joint status	Written Discovery	0.5
5/2/16	Emails with team re: Sabein, Brian Rainey	Case Development	0.25
5/3/16	Reviewing referral order re settlement	Case Development	0.2
5/3/16	Reviewing TK notes re conversation re Brian Rainey	Case Development	0.1
5/4/16	Team meeting to prepare for conference with OC; T/c w OC re discovery	Written and Oral Discovery	2
5/4/16	Reviewing defendant answers to interrogatories and document production	Written Discovery	1
5/4/16	Correspondence with Court re settlement conference dates; correspondence w team re same	Case Development	0.2

5/4/16	Travel to Baltimore re case investigation and witness meeting with Brian Rainey	Case Development	3
5/5/16	Investigation and witness meeting with Brian Rainey, investigation of scene of crime	Case Development	13.75
5/5/16	Client meeting w Sabein re discovery	Case Development	2.5
5/6/16	Correspondence w OC re defendant depositions	Oral Discovery	0.2
5/10/16	Correspondence w TK about defense subpoenas to MAIP/Steptoe; correspondence w SG and TK re deposition scheduling	Case Development	0.5
5/10/16	Correspondence w OC re pending discovery issues, quesitoning of witnesses, Dorsey	Case Development; Written and Oral Discovery	1.25
5/11/16	Correspondence w OC re document production	Written Discovery	0.2
5/11/16	Correspondence with Mort Smith (MS) re locaing witnesses and serving deposition subpoenas	Case Development; Written and Oral Discovery	0.2
5/12/16	Emails with GH, TK, SG re: insurance and indemnification; t/c with TK re: Charles Dorsey and follow up emails	Case Development	0.75
5/12/16	Correspondence w OC re deposition subpoenas	Oral Discovery	0.3
5/13/16	Correspondence w team re service of deposition subpoena on Laura Brokaw	Case Development	0.5
5/13/16	Correspondence and call w OC re order of questioning of third party witnesses	Oral Discovery	1.75
5/13/16	Reviewing defense filing re depositions.	Written and Oral Discovery	0.5
5/15/16	Correspondence w OC re extension for discovery responses	Written Discovery	0.1
5/16/16	T/c with Court re participants in settlement conference; correspondence with Court re same; correspondence with team re same	Case Development	0.75
5/16/16	Reviewing Court scheduling order re settlement conference	Case Development	0.2
5/20/16	Discussion w TK re discovery responses and witness lists	Written Discovery	0.75
5/20/16	Interview with Sabein re discovery responses and case status	Case Development; Written Discovery	1.5
5/22/16	Review of document productions	Case Development	3.5
5/22/16	Drafting discovery responses	Written Discovery	2
5/23/16	Meeting w SG re discovery responses; drafting discovery responses; reviewing discovery responses; editing discovery responses; discussing responses with client	Written Discovery	7.75
5/23/16	Discussion with team about privilege issues for client answers to interrogatories	Written Discovery	2
5/25/16	Draft and send letter to OC re redacted documents; correspondence w OC re same	Written Discovery	1.5
5/25/16	Call w MS re witness investigation	Case Development	0.5

5/25/16	Correspondence w OC re confidentiality order; reviewing of same	Written Discovery	0.5
5/26/16	Correspondence w TK re Tougy requests to FBI, DEA, subpoena to medical examiner	Written Discovery	0.75
5/31/16	Editing Rule 37 letter to individual Defendants; discussing same w TK	Written Discovery	1
6/1/16	Correspondence w LL re service on Gioia	Oral Discovery	0.2
6/6/16	Correspondence w team about discovery into Dorsey and Rainey, documents subpoenas served by Defendants re same, deposition scheduling	Oral and Written Discovery	0.25
6/7/16	Review BPD production	Written Discovery	2.5
6/9/16	Email with GH and JL re: BPD indemnification	Case Development	0.25
6/13/16	Meet and confer with OC; meet and confer with team re same	Oral and Written Discovery	1
6/13/16	Call with Wanda Austin	Case Development	0.5
6/13/16	Editing Rule 37 letter by TK	Written Discovery	0.5
6/15/16	T/c with GH re: case strategy; t/c with SA, TK and SG re: Brian Rainey	Case Development	0.75
6/15/16	Conference with OC	Oral and Written Discovery	1
6/16/16	Editing Touhy requests and subpoena to AG	Written Discovery	0.5
6/16/16	Conference with OC re interrogatory responses	Written Discovery	0.5
6/17/16	Correspondence w TK re investment in Baltimore	Case Development	0.25
6/22/16	Reviewing correspondence we Ron Dyson deposition	Oral and Written Discovery	0.25
6/25/16	Reviewing Rule 37 letter from OC; conferring with team re same	Oral and Written Discovery	0.25
6/25/16	Reviewing settlement letter from Defendants	Case Development	0.25
6/27/16	Travel to Baltimore for Rainey and Dorsey depositions and preparation for depositions; reviewing documents and preparing to interview witnesses; interviewing witnesses; meeting with Brian Rainey; corresponding with OC about late document disclosure	Oral Discovery	13.75
6/28/16	Rainey deposition; correspond with team re same; prep for Dorsey	Oral and Written Discovery	8
6/29/16	Visit to Dorsey; correspond with OC about Dorsey assertion of his rights	Oral and Written Discovery	6.25
6/29/16	Correspondence with Laura Mullally re subpoena to AG	Written Discovery	0.4
6/30/16	Reviewing documents produced by SAO to Defendants	Written Discovery	0.5
7/1/16	Reviewing BPD document production	Written Discovery	0.5
7/1/16	Drafting Burgess mediation memo and settlement lender; sending same	Case Development	4.75
7/1/16	Finalizing subpoena to AG and sending to Laura Mullally	Written Discovery	0.4
7/2/16	Obtaining Fowler and Dawson proofs from process server per request from OC	Oral Discovery	0.75

7/6/16	Team meeting re Dyson interviews and dep, discovery	Oral and Written Discovery	1
7/6/16	Correspondence w OC about pending discovery issues	Oral and Written Discovery	0.75
7/8/16	Correspondence w SG about Dorsey deposition	Oral Discovery	0.75
7/8/16	Correspondence w SG and re Gioia deposition	Oral Discovery	0.25
7/8/16	Reviewing settlement correspondence from OC; corespondence with JL re same	Case Development	0.5
7/11/16	T/c and emails with GH re: MAIP and Steptoe files	Case Development; Written Discovery	0.75
7/11/16	Discussion w TK re production of criminal trial transcript	Written Discovery	0.25
7/12/16	Review and production of documents from the medical examiner subpoena; correspondence w team re same; meeting re Fowler deposition	Written Discovery	1
7/12/16	Correspodnence w OC re Fowler deposition	Oral Discovery	0.2
7/13/16	Correspondence with Gioia about files	Oral and Written Discovery	0.1
7/13/16	T/c and email with GH re: Sabein's PC file	Case Development	0.25
7/15/16	Correspondence w OC re defendant depositions	Oral Discovery	0.25
7/15/16	Correspondence w TK and SG about division of deposition questioning time	Oral Discovery	0.1
7/18/16	Correspondence w team about Wanda Austin deposition	Oral and Written Discovery	0.25
7/19/16	Reviewing DSS motion for protective order; corresponding with DSS re same	Oral and Written Discovery	0.5
7/19/16	Preparation for Wanda Austin deposition	Oral Discovery	3.25
7/20/16	Compiling materials in response to Judge Gauvey's request for documents; sending same to Court	Case Development	2
7/20/16	Preparation for Wanda Austin deposition	Oral Discovery	0.75
7/20/16	Preparation for settlement conference	Case Development	1.25
7/21/16	Reviewing Defendants' response to DSS motion	Written Discovery	0.25
7/21/16	Reviewing and serving Plaintiff's supplemental interrogatory responses	Written Discovery	0.25
7/21/16	Austin deposition preparation and deposition	Oral Discovery	4.25
7/21/16	Preparation for settlement conference	Case Development	3.75
7/22/16	Settlement conference	Case Development	3.5
7/24/16	Reviewing corresondence from DEA re relevancy statement; correspond with DOJ re same	Written Discovery	0.75
7/25/16	Reviewing correspondence from FBI re Touhy request	Written Discovery	0.25
7/26/16	Review order granting protective order	Case Development	0.5
7/29/16	Case discussion with team	Case Development	0.75
8/1/16	Review Dorsey dep transcript	Case Development	1

8/1/16	Review Defendants' supplemental production; correspondence w OC re same; correspondence with SG re same	Oral and Written Discovery	0.75
8/3/16	Correspondence w OC re court conference	Oral and Written Discovery	0.1
8/4/16	Correspondence w OC re document production	Oral and Written Discovery	0.25
8/4/16	Correspondence w SG re Gioia deposition	Oral and Written Discovery	0.5
8/8/16	Team conference about discovery schedule	Oral and Written Discovery	0.5
8/10/16	Research and drafting re litigation of discovery of personnel records; filing same	Oral and Written Discovery	2.25
8/10/16	Reviewing Defendants' filing re discovery of personnel records	Oral and Written Discovery	0.75
8/11/16	Preparation for Court conference; Court conference	Oral and Written Discovery	1.5
8/11/16	Reviewing court order re conference; calendaring dates	Oral and Written Discovery	0.5
8/15/16	Drafting list of topics for in camera review of records	Oral and Written Discovery	0.5
8/23/16	Burgess privilege log drafting	Written Discovery	4.5
8/24/16	Burgess privilege log drafting; meeting with team re same	Written Discovery	3.25
8/25/16	Burgess privilege log drafting	Written Discovery	0.75
8/29/16	Correspondence w TK and SP re Raymond Handy witness	Case Development	0.2
8/30/16	Review correspondence re SAO subpoena response	Written Discovery	0.25
9/1/16	Reviewing offer of judgment and correspondence from OC	Case Development	0.5
9/8/16	T/c w TK and MS re Raymond Handy	Case Development	0.5
9/9/16	Call with OC	Oral and Written Discovery	0.5
9/9/16	Correspondence w GH re FBI 302; review of FBI documents	Case Development	1.25
9/15/16	Correspondence w OC re modifying schedule	Oral and Written Discovery	0.2
9/19/16	Correspondence w Court re hearing re scheduling	Oral and Written Discovery	0.25
9/19/16	Review order re revised schedule; correspondence w team re same	Oral and Written Discovery	0.25
9/22/16	Correspondence w TK re experts	Oral and Written Discovery	0.1
9/22/16	Correspondence w OC re scheduling	Oral and Written Discovery	0.5
9/23/16	Correspondence w OC re scheduling	Oral and Written Discovery	0.5
9/26/16	Correspondence w OC re scheduling motion; drafting same; conferring with OC re same; filing same	Oral and Written Discovery	1.25
9/27/16	Email with GH re hiring experts and case update/brainstorming	Case Development	1.25
9/29/16	Email w GH, TK, MS re Tawanda Dyson	Case Development	0.75
10/3/16	Drafting and editing discovery letter for Judge Bennett	Oral and Written Discovery	1.25
10/4/16	Correspondence w OC re BCDSS subpoenaed records	Oral and Written Discovery	0.3
10/5/16	Reviewing FBI and DEA document responses and drafting supplemental touhy declaration	Oral and Written Discovery	1.5

10/5/16	Correspondence w MS, GH, TK, SG re Lashanda Roberts	Case Development	0.5
10/6/16	Correspondence w OC re deposition scheduling	Oral and Written Discovery	0.5
10/10/16	Burgess team meeting	Case Development	2
10/11/16	Correspondence w TK and GH re Schack's deposition	Case Development	0.5
10/11/16	Correspondence w MS re witness Bee Bee Wright	Case Development	0.25
10/12/16	Correspondence w OC re motion re holding open Defendant depositions	Oral and Written Discovery	0.25
10/13/16	Correspondence w OC re motion re holding open Defendant depositions	Oral and Written Discovery	0.25
10/16/16	Correspondence w TK and GH re Rice murders and questions for Lehmann and Purtell depositions	Oral Discovery	1
10/17/16	Correspondence with Tony Balkissoon (TB) re Bagley deposition prep	Oral Discovery	0.75
10/17/16	Complete discovery dispute correspondence for Judge Bennett; file same	Oral and Written Discovery	0.75
10/18/16	Call with client	Case Development	0.5
10/19/16	Team meeting; correspondence w GH, TK, TB re depositions	Case Development	1
10/21/16	Talk with TB re Bagley deposition	Oral Discovery	0.5
10/24/16	T/c with GH re: Dyson kids' depositions	Oral Discovery	0.5
10/24/16	Call w Tawanda Dyson	Case Development	0.5
10/24/16	Reviewing TB notes of Bagley interview; correspondence w TB and TK re same; helping TB prepare for Bagley deposition	Oral Discovery	1
10/24/16	Gathering documents and discovery materials for Arthur Loevy (AL) in preparation for upcoming Defendant depositions	Oral and Written Discovery	5.5
10/25/16	Correspondence w team re witness testimony in preparation for depositions	Oral and Written Discovery	0.5
10/27/16	Preparing with AL for Goldstein and Ritz depositions	Oral Discovery	12.25
10/28/16	Production of emails to Tawanda Dyson; preparing with AL for Goldstein and Ritz depositions	Oral and Written Discovery	7.25
10/28/16	Team meeting re juvenile records	Written Discovery	0.25
10/28/16	Correspondence w OC re document productions	Written Discovery	0.5
10/28/16	Drafting new interrogatories and editing and serving same	Written Discovery	0.75
10/31/16	Reviewing Defendants' response to our motion to hold open Defendant depositions; preparation for Goldstein deposition, writing outline	Oral Discovery	15.75
11/1/16	Preparation for Goldstein deposition; Goldstein deposition; travel to and from deposition; all with AL	Oral Discovery	18
11/2/16	Preparation for Shabria dep; Shabria dep; all with TB	Oral Discovery	3.5
11/2/16	T/c with GH re: case strategy and update on Defendant Goldstein; scheduling emails with o/c	Oral Discovery	0.5

11/3/16	Email and t/c with GH and Mort Smith re: case investigation; emails with team re: discovery disputes and homicide file; review email with o/c re: discovery disputes; team discussion re: Rule 30(b)(6) deposition; email to o/c asking to inspect file	Oral and Written Discovery	2.25
11/3/16	Reviewing notice of Plaintiff's deposition	Oral Discovery	0.1
11/4/16	Email with team re police practices experts; email w SP re document production and FBI production	Written Discovery	0.3
11/5/16	Reviewing clips of Dorsey interview	Oral and Written Discovery	0.5
11/15/16	Correspondence w team re Rainey documents; discussion re first amended complaint	Motion Practice; Written Discovery	0.75
12/2/16	Review response to motion for leave to amend		0.5
12/20/16	Review defendants' responses to discovery	Written Discovery	0.7
12/27/16	Team call re: strategy and outstanding items	Case Development	1.5
12/27/16	Correspondence w OC re reopening defendant depositions and the Dyson homicide files	Oral and Written Discovery	0.5
12/28/16	Work on expert materials for expert reports	Written Discovery	3.75
1/3/17	Confer w team re damages experts; review Sabein's deposition	Oral and Written Discovery	4.25
1/5/17	Email correspondence with team re: case strategy and follow-up discovery	Case Development; Written Discovery	0.3
1/6/17	Review order re referral; correspondence w team re joint status report	Case Development	0.75
1/11/17	Drafting letter re reopening deps; corresponding with GH, TB, SG re same	Oral Discovery	1.75
1/12/17	Editing Rule 37 correspondence about Defendants' discovery responses	Written Discovery	0.5
1/17/17	Edit Rule 30(b)(6) request and edit; email correspondence with team re: experts; review interrogatory answers; review Defendants' subpoena	Oral and Written Discovery	1.5
1/19/17	Meet and confer with OC; preparation for same	Oral and Written Discovery	1
1/23/17	Meet and confer with OC; preparation for same	Oral and Written Discovery	1
1/23/17	Conference with Court; preparation for same; debrief with team	Oral and Written Discovery	2
1/24/17	Reviewing new scheduling order	Oral and Written Discovery	0.25
1/25/17	Team meeting re: case strategy, serving new defendants, getting deps scheduled, etc.	Case Development	0.25
1/26/17	Conference re GSR expert; correspondence re discovery schedule, deposition dates; team meeting re outstanding discovery	Case Development	0.75
1/27/17	Review UMD records	Written Discovery	0.5

2/6/17	Review BPD response to discovery letter on interrogatories; correspondence with OC	Written Discovery	0.25
2/6/17	Organize service of new defendants	Written Discovery	0.75
2/10/17	Correspondence w OC re: scheduling depositions	Written Discovery	0.2
2/13/17	Follow-up on defendants' supplement to MD Parole Commission on Dorsey	Written Discovery; Case Development	0.4
2/14/17	T/c w OC; review BPD's letter response; correspondence w OC re Mann files and privilege	Written Discovery; Case Development	2.25
2/15/17	Call with BPD re: outstanding discovery; preparation for same	Written Discovery; Case Development	1.5
2/16/17	Edit letter to BPD re: outstanding discovery disputes	Written Discovery; Motion Practice	0.75
2/17/17	Emails with o/c and team re: deposition scheduling	Oral Discovery	0.25
2/22/17	Correspondence w OC re Johnson subpoena	Written Discovery	0.5
2/27/17	Correspondence w OC re FOIA		0.25
3/4/17	Reviewing supplemental disco responses from OC	Written Discovery	0.75
3/8/17	Conference w OC re outstanding discovery	Oral and Written Discovery	1
3/8/17	T/c w GH re evidence inspection; correspondence re same	Written Discovery	0.5
3/9/17	T/c w GH re files; correspondence re strategy with OC re Tayback file	Written Discovery	0.75
3/10/17	Review and production of Tayback files; correspondence w GH re same; editing letter submission for the Court	Written Discovery	1.75
3/13/17	Review Defendants' submissions to Court re: discovery dispute; email re: court hearing and discovery dispute; review docs produced by BPD; Call to DOJ atty re FBI production	Oral and Written Discovery	1.25
3/14/17	Review Rice docs and TK summary of Rice docs and FOIA; call w team re Court conference; outline of court call for SG	Oral and Written Discovery	1.5
3/15/17	Court conference; review of Court ruling; debrief w team	Oral and Written Discovery	1.25
3/15/17	Call w OC re criminal defense file discovery	Written Discovery	0.25
3/17/17	Read BPD letter correction; call w team re Rice discovery	Oral and Written Discovery	0.75
3/21/17	Continued privilege review and correspondence w SP and GH re same	Written Discovery	0.5
3/27/17	Edit interrogatory responses	Written Discovery	0.5
3/31/17	Editing and drafting motion re Howard Rice discovery	Motion practice	4
4/4/17	Correspondence w OC re FOIA requests	Written Discovery	0.75
4/5/17	TC with GH re: FBI Touhy request; team emails re: outstanding deps; drafting letter re Tayback file subpoena	Written Discovery	1.3
4/10/17	Editing Rice motion; filing same; reviewing answers, writing correspondence re same	Written Discovery	5.25

4/12/17	Email with o/c re: outstanding discovery responses; confer w SG and GH re Holems dep	Written Discovery	1
4/13/17	Email with team re: dead witnesses, Holmes deposition; prep Holmes; follow-up w FBI	Case Development	1.25
4/18/17	T/c w Tom re re-opened defendant depositions; communicating with team re same	Oral Discovery	0.75
4/20/17	Edit updated Rule 30(b)(6) notice; emails with team re: outstanding discovery, including FBI subpoena	Written Discovery	0.75
4/21/17	Emails with team re: outstanding deps, case strategy, FBI subpoena; t/c with GH re: case strategy	Written Discovery; Case Development	1.5
4/24/17	Reviewing response re Rice motion; correspondence w team re same	Written Discovery; Motion Practice	1
4/25/17	Edit reply brief	Written Discovery; Motion Practice	0.25
4/28/17	Conference w DOJ counsel re FBI files; correspondence w team re same	Written Discovery	0.5
4/30/17	Call w McAllister and MS; correspondence w team re same	Case Development	0.5
5/4/17	Correspondence w OC re prior counsel subpoenas for documents	Written Discovery	0.25
5/5/17	Emails with team re: Rule 30(b)(6) dep and Howard Rice; call w Armbrust re files; call w Georgetown counsel	Oral and Written Discovery	2.25
5/8/17	Review and edit new witness lists; confer w team re outstanding discovery items, Howard Rice; discuss Lehmann dep w GH	Oral and Written Discovery	3
5/9/17	Confer w GH about defendants' request for second dep of client; editing GH 30(b)(6) outline	Oral and Written Discovery; Case Development	1.5
5/10/17	Reviewing GH dep notes; conferring re 30(b)(6) dep	Oral Discovery	0.5
5/11/17	Confer w TB re McCallister dep	Oral Discovery	0.5
5/12/17	Court hearing regarding Rice motion and debrief team; prep for same; emails re: outstanding depositions; corresponding with prior Burgess counsel	Case Development; Court hearing	1.25
5/15/17	Review FBI files; debrief on Touhy response with GH (t/c); confer w prior Burgess counsel re files; coordinating depositions with TB and SG; reviewing TB summary of Weese deposition;	Oral and Written Discovery	4.25
5/16/17	Palmere and Skinner dep prep	Oral Discovery; Case Development	4.25
5/17/17	Palmere and Skinner dep prep	Written Discovery	9.25
5/18/17	Travel to Baltimore and Palmere Dep; Skinner dep prep	Written Discovery	11.25
5/19/17	BPD file review; correspondence we team re depositions and file review; return travel to Chicago	Written Discovery; Case Development	6.5
5/21/17	Confer w Tony re Ritz deposition		1
5/22/17	Review TB outline for Ritz dep		0.75
5/23/17	Emails with team re: Purtell re-dep; pull docs re: Purtell re-dep; emails with team re: Patton and Neverdon re-deps	Oral Discovery	0.5

5/24/17	Confer w TB re Weese dep; CAD sheet inspection and conferring w team re same	Oral Discovery	1
5/26/17	Compiling documents for Stine; discussing Willis w TB	Oral and Written Discovery; Case Development	1.25
5/30/17	Confer w Stine; reveiw documents for Stine; transmit same	Case Development	2.5
6/1/17	TC with GH re: FBI files; emails with team re: FBI docs; review Steptoe files; confer w JL re Stine	Oral and Written Discovery; Case Development	1.75
6/2/17	TC with SA re: SB re-dep; edit letter to Court	Oral and Written Discovery	0.75
6/5/17	Conference with Court; prepare for same; confer w team re same; review TB Williams dep summary	Motion practice	1.25
6/6/17	Reviewing Court order	Oral and Written Discovery	0.25
6/13/17	Call w Stine; editing interrogatory responses	Case Development	2.25
6/14/17	T/c with gH re: discovery schedule; editing interrogatory responses	Written Discovery; Case Development	1
6/15/17	Edit interrogatory responses to new defendants	Written Discovery	3.25
6/16/17	Edit interrogatory responses to new defendants	Written Discovery; Case Development	1
6/21/17	Debrief on SB re-dep	Oral Discovery	0.2
6/28/17	Review and comments on psych expert report; review and comments on GSR report; review and comments on prosecutor report	Case Development	7
7/6/17	Confer w Stine; Tc w Stine; gathering materials and sending to Stine	Case Development	2.5
7/7/17	Confer w Stine; Tc w Stine; gathering materials and sending to Stine; Rice memo	Case Development	8.25
7/10/17	Confer w Stine; Tc w Stine; gathering materials and sending to Stine; review Stine draft supports, offer comments on same		5
7/11/17	Work with Stine on draft report; correspondence w team re same		6.5
7/13/17	Work with Stine on draft report; correspondence w team re same		4.75
7/14/17	Work with Stine on draft report; correspondence w team re same; conferring with Stine; finalizing report		8.75
8/4/17	Confer w GH re expert dep prep and gathering documents for same		0.75
8/9/17	Reviewing TB summary of Stine dep; dep recap w Stine		1
8/17/17	Emails with GH & TK re: experts; completing Niemeyer rebuttal report and disclosing same; draft RTAs	Case Development	6.75
8/16/17	Neimeyer dep prep; prep for same; discussion w TK re same; work on rebuttal report		4
8/18/17	Neimeyer call; debrief w team abotu Niemeyer dep performance		2.25
8/18/17	Confer w TB about indemnification	Case Development	1

8/22/17	Emails with team re: scheduling deps and possible rebuttal reports; t/c with GH and SB re: rebuttal	Oral Discovery; Case Development	0.5
8/23/17	Drafting RTAs; conferring w team re same	Written Discovery; Case Development	1.25
8/24/17	Team calls on case strategy; serving expert subpoenas	Written Discovery	1.5
8/25/17	Motion to withdraw SG	Motion practice	0.75
9/4/17	Reviewing case correspondence sent during vacation; corresponding w team re same	Written Discovery	1.25
9/7/17	Responding to RTAs; reviewing Tony expert dep overview	Written Discovery	5
9/8/17	Responding to RTAs	Written Discovery	7
9/11/17	Edit RTAs; emails re: defendants filing SJ and setting briefing schedule	Written Discovery	1.75
9/19/17	Read SJ briefs; correspondence w team	Motion Practice	5.5
9/25/17	Correspondence w GH re SJ	Motion Practice	0.25
9/29/17	Reviewing GH SJ outlines and corresponding w team	Motion Practice	4.5
10/3/17	Research and drafting re summary judgment brief; corresponding w team re same	Motion Practice	9.25
10/4/17	Research and drafting re summary judgment brief; corresponding w team re same; T/c with GH and JL re: trial date and case strategy; corresponding w team re pretrial schedule; conference w OC	Motion Practice	5
10/5/17	Draft proposed status; Research and drafting re summary judgment brief; corresponding w team re same	Motion Practice	3.25
10/7/17	Research and drafting re summary judgment brief; corresponding w team re same	Motion Practice	14
10/8/17	Research and drafting re summary judgment brief; corresponding w team re same	Motion Practice	16.25
10/9/17	Research and drafting re summary judgment brief; corresponding w team re same; filing same	Motion Practice	15.75
10/10/17	Research and drafting re summary judgment brief; corresponding w team re same; filing same; call to Court; conferring w OC	Motion Practice	7.5
10/12/17	Brainstorm stipulations and motion in limine (MIL) ideas; confer w GH re FPTO	Trial Preparation	1.25
10/13/17	Prepare for and attend court hearing; confer w team re schedule	Court hearing	0.75
10/14/17	Correspond w team re trial witnesses; correspond w OC re dep		0.5
10/15/17	Confer w team re MILs and witnesses		0.75
10/16/17	Review FPTO and exhibits; confer re MILs; emails with o/c re: scheduling Muhamad dep; review proposed stipulations	Trial Preparation	1.75
10/17/17	T/c with team re: trial prep; draft MILs; email with OC re: trial and review response; emails with team re: exhibits; team meeting; talk with AL re settlement demand	Trial Preparation	11.25

10/18/17	Edit FPTO and exhibits to FPTO; emails with JL and GH re: FPTO and MILs; drafting MILs	Trial Preparation	14
10/19/17	Draft and edit MILs; confer with team about MILs and other trial matters	Trial Preparation	15.5
10/20/17	Draft and edit MILs; confer with team about MILs and other trial matters	Trial Preparation	12.75
10/21/17	Read Defendants MILs; Draft and edit MILs; filing same; confer with team about MILs and other trial matters	Trial Preparation	4.5
10/23/17	Correspondence w team re drafting jury instructions; confer w team about same and other trial matters; drafting/reviewing MIL responses	Trial Preparation	3.25
10/24/17	Trial prep with team	Trial Preparation	11.75
10/25/17	Prep for SJ argument w GH and TB	Trial Preparation	1.5
10/26/17	Confer w team re SJ argument; draft MIL responses; trial prep	Trial Preparation	14.5
10/27/17	Draft MIL responses; trial prep	Trial Preparation	10.25
10/29/17	Trial prep with team	Trial Preparation	9
10/30/17	Edit PTO and organizing exhibits; trial prep; prep for pretrial conference; filing PTO	Trial Preparation	16
10/31/17	Exhibit work; PTC prep; corresponding with team; review SJ decision	Trial Preparation	11
11/1/17	Drafting motion to certify qualified immunity appeal as frivolous in response to threat by Defendants to appeal; work on punitive damages; conferring w team re jury instrucionts; drafting jury instructions	Trial Preparation	6.75
11/2/17	Work on cross for less-involved defendants and points for settlement; conferring with TB re same; draft jury instructions; conferring w DH re same; confer re settlement negotiations	Trial Preparation	5.25
11/3/17	Reviewing MIL rulings; drafting jury instructions; filing same	Trial Preparation	4.75
11/4/17	Conferring w team re punis		0.25
11/5/17	Helping with demonstratives		1
11/7/17	Assisting in Burgess jury selection		5.25
11/19/17	Reviewing Rule 50 motion; jury instructions	Trial	3.75
11/20/17	Assist with jury instruction research and argument	Trial	2.5
11/30/17	Joint motion to extend deadlines for fee petition	Post-trial	0.25
12/15/17	Response to Monell motion review	Post-trial	0.5
1/3/18	Edit joint motion to stay fee petition	Post-trial	0.1
1/17/18	Team meeting re post-trial motion; assist with PTM response	Post-trial	1
1/26/18	Edit post-trial motion	Post-trial	5.75
2/8/18	Review order on Monell discovery	Post-trial	0.25
2/9/18	Review PTM reply	Post-trial	0.5
3/12/18	Review order on Rule 50/59	Post-trial	0.75
4/3/18	Confer with team re docketing appeal	Post-trial	1.25

4/5/18	Review defendants' letter re: appeal	Post-trial	0.25
4/8/18	Emails with team re: response to defendants' letter; confer w JL re same	Post-trial	0.5
4/12/18	Draft letter about final judgment in response to Defendants' submission; edit same; confer w team re same; read Defendants' submission	Post-trial	2
4/17/18	Edit TB objection to defendants' docketing statement	Post-trial	0.25
4/18/18	Confer with team re mediation	Post-trial	0.25
4/19/18	Apperance in appeal	Post-trial	0.25
5/1/18	Confer w JL re indemnification; confer w team about amending judgment	Post-trial	1
5/2/18	Prep call with Court; call with court; follow-up with team	Post-trial	1
6/25/18	Emails with team re: jurisdiction	Post-trial	0.25
7/10/18	Read Goldstein's brief	Post-trial	3
7/11/18	T/c with team re: strategy for Burgess appeal	Post-trial	0.5
8/21/18	Drafting and filing motion to extend appeal brief time	Post-trial	1
9/13/18	Drafting and filing motion to extend appeal brief time	Post-trial	0.5
10/12/18	Research, record review, drafting for appellate brief	Post-trial	0.5
10/14/18	Research, record review, drafting for appellate brief	Post-trial	3
12/6/18	Review reply on appeal	Post-trial	1.25
1/25/19	Email correspondence with team re: appellate jurisdiction	Post-trial	0.25
1/25/19	Email correspondence with team re: appellate jurisdiction	Post-trial	0.25
1/29/19	Moot with JL for O/A	Post-trial	2.5
1/30/19	Debrief on oral argument and Rule 28(j) strategy	Post-trial	2
1/31/19	Edit Rule 28(j) letter	Post-trial	0.25
2/27/19	Review court order and email correspondence with team	Post-trial	0.25
3/6/19	T/c with TK, SA and JL re: supplemental briefing; email correspondence with TK re: draft of supplemental brief	Post-trial	1.5
3/11/19	Edit second draft of supplemental brief	Post-trial	0.75
4/2/19	Review 4th Circuit order; correspond w team re same; call w JL re same	Post-trial	0.75
4/5/19	Review motion to dismiss (BPD); email correspondence with team re: response to MTD	Motion Practice	0.5
4/9/19	Court call re pending motion; preparation with team for same	Motion Practice	1.25
4/29/19	Edit response to BPD MTD	Motion Practice	3.5
5/31/19	Review order on MTD; notice of appeal; confer with team re cross-appeal	Motion Practice	1
6/2/19	Confer w JL re fees and costs pending second appeal and stay	Post-trial	0.5
6/3/19	Draft, edit, file notice of cross-appeal	Post-trial	1.5
6/6/19	Reviewing docketing notice from CA4	Post-trial	0.5

6/10/19	Reviewing defendants' docketing statement; conferring w team re same	Post-trial	0.75
6/17/19	Conferring w JL about stay on fee and cost litigation; drafting appellate filings	Post-trial	5.75
6/18/19	Conferring w defense counsel about motion to expedite; conferring w JL re same; drafting appellate filings; reviewing motion to expedite	Post-trial	11.75
6/19/19	Confer w Defendants about litigation of fees and costs; conferring w JL re same; drafting appellate filings	Post-trial	9.5
6/20/19	Finalizing and editing appellate filings--response, docketing statement, caption	Post-trial	6.5
7/1/19	Motion re fees and costs; editing	Post-trial	0.5
7/3/19	Motion to correct caption in CA4	Post-trial	1
7/9/19	Review CA4 order on rebriefing; confer w team re same	Post-trial	0.5
7/22/19	Review court order re fees; work on joint appendix	Post-trial	1.25
7/24/19	Meeting with summer associates re brief research and draft sections	Post-trial	1.5
8/7/19	Email with o/c re: Joint Appendix; t/c with GH re: Joint Appendix	Post-trial	0.25
8/20/19	Review defendants' opening brief	Post-trial	1.25
8/30/19	Team call re appellate brief strategy	Post-trial	1
9/6/19	Extension motion	Post-trial	0.5
9/25/19	Meeting re appellate brief w JL and MC	Post-trial	0.5
9/30/19	Work on appellate brief	Post-trial	5
10/1/19	Work on appellate brief	Post-trial	11.25
10/2/19	Work on appellate brief and supp appendix	Post-trial	9.75
10/3/19	Work on appellate brief and supp appendix; filing	Post-trial	3.25
11/19/19	Reveiwing reply brief	Post-trial	1.5
11/26/19	Confer re request for extension; editing same	Post-trial	0.5
1/7/2020	Drafting reply brief in cross-appeal on Monell issue	Post-trial	11.5
1/7/2020	Drafting reply brief in cross-appeal on Monell issue	Post-trial	12.25
	Drafting reply brief in cross-appeal on Monell issue	Post-trial	8.75
11/3/20	Confer w JL and ME re argument confirmation	Post-trial	0.25
11/28/20	Confer w JL re oral argument and case research	Post-trial	1.5
12/2/20	Confer w John Hazinski re oral argument and case research	Post-trial	2.25
12/9/20	JL moot	Post-trial	3
12/10/20	Confer w JL and JH re case research in prep for argument	Post-trial	0.5
12/11/20	Listening to CA4 argument	Post-trial	1
5/14/21	Read 4th Circuit opinion	Post-trial	1.25
6/22/21	Emails with GH and JL re: filing fee petition deadline	Fee Petition	0.25
8/24/21	T/c with GH and JL re: fees and costs	Fee Petition	0.25
10/27/21	Edit motion for attorneys' fees/costs	Fee Petition	1.5

10/28/21	Edit motion for attorneys' fees/costs	Fee Petition	5.25
	TOTAL HOURS		911.45

Teresa Kleinhaus			
Date	Description	Category	Time
3/23/2016	review of complaint and court order	Case Development	0.5
3/26/2016	disco requests	Written Discovery	2
3/28/2016	file review	Case Development	3.5
3/28/2016	file review	Case Development	1
3/29/2016	review of motions and orders in docket	Pleadings	0.25
3/29/2016	revision of disco drafts	Written Discovery	0.75
3/30/2016	review of criminal trial transcript	Case Development	0.5
3/30/2016	meeting with grusin and Steve/email to defense counsel re electronic service	Case Administration, Case Development	0.5
3/30/2016	updating litigation task list	Case Administration, Case Development	0.25
3/30/2016	call sabein	Case Development, Case Administration	0.25
3/31/2016	review of trial transcript	Case Development	4
3/31/2016	revising initial disco	Written Discovery	2.25
4/6/2016	call with city attorney sharon/discussion with Steve and grusin	Case Development	0.25
4/7/2016	strategy discussion with Sarah grusin	Case Development	0.25
4/8/2016	review draft foia	Case Administration	0.5
4/8/2016	review of pc transcript	Case Development	1.25
4/8/2016	review of docs	Case Development	1.75
4/14/2016	review of discovery requests	Written Discovery	0.25
4/18/2016	develop chronology of major case events and related homicides	Case Development	3.5
4/19/2016	develop chronology of major case events and related homicides	Case Development	0.25
4/19/2016	discussion with Sarah and Steve	Case Administration	0.25
4/20/2016	develop chronology of major case events and related homicides	Case Development	2
4/21/2016	develop chronology of major case events and related homicides	Case Development	6
4/22/2016	develop chronology of major case events and related homicides	Case Development	0.75
4/27/2016	disco plan	Case Development	1
4/27/2016	draft notice of dep	Depositions	0.75
4/27/2016	investigation re Brian Rainey	Case Administration, investigation	0.25
4/27/2016	brainstorm claims and strategy	Case Development	0.25
4/27/2016	review proposed disco plan	Written Discovery	0.75
4/27/2016	strategy discussion	Case Development	0.25
4/28/2016	subpoenas	Written Discovery	0.75
5/2/2016	Brian Rainey prep for meeting	Case Administration, investigation	1.25
5/2/2016	finalizing joint status report	Case administration	0.25
5/3/2016	discussion/Gayle, Steve grusin	Case Administration	0.75

5/3/2016	review of docs for chronology; prep for Dorsey interview; update litigation task list and strategy	Case Administration, Case Development	2.25
5/4/2016	disco review	Written Discovery	2
5/4/2016	review of docs for chronology; prep for Dorsey interview; update litigation to do list and strategy	Case Administration, Case Development	1
5/4/2016	strategy meeting/ call with oc	Case Administration, Case Development	1.5
5/4/2016	review of docs for chronology; prep for Dorsey interview; to do list and strategy	Case Administration, Case Development	0.25
5/4/2016	review of initial disco responses	Case Administration, Written Discovery	0.5
5/5/2016	investigation--Rainey, scene, client meeting	Background Investigation	13
5/6/2016	investigation--Dorsey	Background Investigation	7
5/11/2016	calls w/ steptoe and maip	Case Administration	0.75
5/11/2016	correspondence re bpd production	Case Administration	1
5/11/2016	investigation re Laura shack jerry spears/Davis/Wanda Alston	Background Investigation	1
5/11/2016	correspondence re bpd production	Case Administration	0.75
5/19/2016	review docs for responses	Written Discovery	3.75
5/19/2016	draft doc responses	Written Discovery	0.75
5/19/2016	draft doc responses	Written Discovery	1
5/20/2016	discussion with Steve	Case Administration	0.25
5/20/2016	draft doc responses	Written Discovery	0.5
5/20/2016	discussion with Steve	Case Administration	0.5
5/21/2016	wit list	Case Development	2.75
5/22/2016	wit list	Case Development	1
5/25/2016	letter on bpd rogs	Written Discovery	0.25
5/25/2016	letter on bpd rogs; research on disco obligations	Written Discovery	1
5/26/2016	bpd rogs	Written Discovery	0.25
5/26/2016	review of docs from defendants 1-111	Case Development	1.25
5/26/2016	letter to bpd re disco responses	Written Discovery	0.5
5/26/2016	letter to bpd re disco responses and discussion w/Steve	Written Discovery, Case Administration	0.25
5/26/2016	Touhy request	Written Discovery	0.25
5/26/2016	subpoena to m.e.	Written Discovery	0.5
5/26/2016	research re Touhy requests	Case Development	1
5/31/2016	discussion w/ Steve & drafting letter re individual defendant doc production	Case Administration, Written Discovery	2.5
5/31/2016	draft letter to bpd	Case Development	0.75
5/31/2016	review of individual rog responses to determine strategy	Written Discovery	0.25
5/31/2016	discussion w/ Steve & drafting letter re individual defendant doc production	Case Administration, Written Discovery	1
6/1/2016	wit discussion	Case Development	1

6/1/2016	call re wits	Case Administration	0.5
6/6/2016	draft Touhy request	Written Discovery	0.5
6/6/2016	discussion of Dorsey	Case Administration	0.25
6/6/2016	draft Touhy request/research and review re Howard rice, subpoena rider to AG's office	Case Development	0.75
6/6/2016	making plans for next Baltimore trip/prep re Dorsey calling pd	Case Development, Case Administration	0.5
6/6/2016	research re witness unavailability under the federal rules of evidence	Case Development	0.5
6/7/2016	review of new docs from individual defendants	Document Production	0.75
6/7/2016	review bpd correspondence	Case Development	0.25
6/7/2016	planning upcoming investigative trip to Baltimore	Case Development	0.25
6/8/2016	f/u Baltimore plans	Case Development	0.25
6/9/2016	review of new Dorsey docs	Case Development	1.5
6/9/2016	prep/research for 37.1 conference re deficient disco responses	Written Discovery, Case Administration	1.25
6/9/2016	review of correspondence from individual defendants and Dorsey info	Case Development	0.5
6/10/2016	review of docs from bpd	Document Production	0.75
6/13/2016	37.1 call with Sharon and Kelly	Case Administration	0.75
6/13/2016	discussion with team and drafting confirming letter and letter re GSR contamination docs	Case Administration	1
6/15/2016	group discussion and Baltimore investigation prep	Case Administration	1.5
6/16/2016	investigation in Baltimore-two hours travel	Background Investigation	12
6/17/2016	investigation in Baltimore	Background Investigation	4
6/22/2016	f/u appointment with Ron Dyson and Dorsey representation	Case Development	0.5
6/22/2016	travel plans for next week	Case Development	0.25
6/24/2016	calls re civilian clothing and goia file	Case Development	0.25
6/26/2016	prep for Baltimore	Depositions	0.5
6/27/2016	prep of Brian Rainey	Depositions	4
6/28/2016	Rainey dep	Depositions	5
6/29/2016	visit to Charles Dorsey (includes 3 hours travel)	Depositions	4.75
6/29/2016	investigation	Background Investigation	6
7/6/2016	Dyson discussion	Case Administration	0.25
7/6/2016	discussion with Steve and Sarah	Case Administration	0.75
7/6/2016	discussion with Gayle; f/u on goia docs	Case Administration	0.5
7/7/2016	f/u fowler subpoena and docs	Case Administration	0.25
7/11/2016	team meeting	Case Administration	0.5
7/11/2016	prep for fowler/Brokaw deps	Depositions	1.75
7/12/2016	prep for fowler	Depositions	5.25
7/12/2016	discussion with medical examiner re files	Case Development	0.25

7/12/2016	producing docs from medical examiner	Document Production	0.25
7/13/2016	prep for fowler	Depositions	3.75
7/13/2016	Brokaw prep	Depositions	3
7/14/2016	Brokaw prep	Depositions	8.75
7/19/2016	strategy discussion and conf call	Case Administration	0.75
7/21/2016	review of revised interrogatories	Written Discovery	1
7/29/2016	case discussion with team	Case Administration	0.75
8/11/2016	court call	Case Administration	0.75
8/15/2016	review topic list for in camera review	Case Development	0.25
8/29/2016	review of docs from atty general	Case Development	2
9/8/2016	investigation for burgess	Background Investigation	8
9/9/2016	investigation for burgess	Background Investigation	6
9/16/2016	doc review of atty gen docs	Case Development	2
9/19/2016	status call/update	Case Administration	0.5
10/6/2016	revising DEA Touhy request	Case Development	0.25
10/10/2016	burgess meeting	Case Development	1.75
10/10/2016	motion	Pleadings	0.5
10/10/2016	helping Gayle prep for purtell and lehmann	Depositions	0.25
10/11/2016	helping Gayle prep for purtell and lehmann	Depositions	1.75
10/11/2016	review of docs for defendant deps	Depositions	0.75
10/11/2016	review of docs for defendant deps/strategy/doc review	Depositions	0.75
10/12/2016	purtell and lehmann deps	Depositions	0.25
10/13/2016	mtn keep deps open and letter with bpd	Motion Practice	0.75
10/16/2016	purtell and lehmann deps	Depositions	1.5
10/17/2016	purtell and lehmann deps	Depositions	0.5
10/17/2016	joint letter re Dorsey and rice documents and rogs	Case Administration	0.75
10/17/2016	review of case law	Case Development	0.25
10/17/2016	joint letter re Dorsey and rice documents and rogs	Case Administration	0.5
10/19/2016	meeting	Case Administration	0.75
10/28/2016	emails with the team	Case Administration	0.25
11/2/2016	team call on burgess	Case Development	1
11/2/2016	dep prep	Depositions, Case Development	0.75
11/2/2016	dep prep/doc review	Depositions, Case Development	1.5
11/3/2016	dep prep/doc review	Depositions, Case Development	6
11/4/2016	dep prep/doc review	Depositions, Case Development	2.25
11/4/2016	research on the juvenile records law in md to get jerry Davis records	Case Development	0.75
11/4/2016	studying the Howard Rice murder files	Case Development	3.25
11/4/2016	dep prep/doc review	Depositions, Case Development	0.75

11/6/2016	dep prep/doc review	Depositions, Case Development	1
11/6/2016	dep prep/doc review	Depositions, Case Development	0.5
11/6/2016	review and learning Howard rice docs	Case Development	0.5
11/7/2016	review and learning Howard rice docs	Case Development	1.75
11/7/2016	call with potential police practices expert & debrief w/ team	Case Development	1
11/7/2016	burgess review of Howard rice homicide files	Case Development	2.5
11/8/2016	burgess review and dep prep	Depositions	1
11/8/2016	burgess review of homicide files/dep prep	Depositions	9
11/9/2016	burgess dep prep	Depositions	2
11/10/2016	Patton and neverdon and Weese Deps	Depositions	9
11/14/2016	burgess--researching experts, revising motion, drafting disco	Case Development, Motion Practice, Written Discovery	3.5
11/15/2016	calling experts	Case Development	1
11/15/2016	calling experts/discussing with Gayle/review of draft motion for leave to amend	Case Development	1
11/15/2016	calling experts/putting together materials for experts	Case Development	1
11/16/2016	motion to file under seal/motion for leave to amend	Case Development	0.75
11/16/2016	team emails	Case Development	0.25
11/17/2016	discussion with Gayle	Case Development	0.25
11/17/2016	prep for status conference	Case Development	1
11/17/2016	status call with the court	Case Administration	1.25
11/21/2016	team emails	Case Development	0.5
11/28/2016	team emails	Case Development	0.5
11/28/2016	Follow up on tasks/update litigation to do list	Case Development	0.75
11/29/2016	f/u new disco from colin at BPD	Written Discovery	1
11/29/2016	f/u new disco from colin/fu/ with experts; helping with sabein prep	Written Discovery, Depositions	0.25
11/29/2016	review of state's attorney file for burgess dep prep	Depositions	1.75
11/30/2016	team emails	Case Development	0.75
11/30/2016	call with Brian murphy	Case Development	0.5
11/30/2016	tony g investigation	Background Investigation	0.25
12/2/2016	discussion with Niemeyer	Case Development	1
12/5/2016	damages questions/finding a psych expert	Case Development	1.75
12/6/2016	talking to possible expert on damages	Case Development	0.75
12/8/2016	discussion with Gayle	Case Development	0.25
12/8/2016	discussion with Gayle re reply for leave to amend	Case Development	0.5

12/9/2016	review of defendant interrogatories	Written Discovery	0.5
12/9/2016	revising reply brief on leave to amend/burgess investigative tasks	Pleadings, Background Investigation	5.5
12/12/2016	review of van Gelder dep outline	Depositions	0.25
12/12/2016	finding damages wit	Case Development	0.5
12/13/2016	damages wit investigation	Case Development	0.5
12/14/2016	emails re new disco schedule	Case Development	0.5
12/15/2016	damages wit investigation	Case Development	0.25
12/16/2016	damages wit investigation	Case Development	0.25
12/22/2016	review of James Durham/retainer for binks	Case Development	2
12/23/2016	review of James Durham/retainer for binks	Case Development	0.5
12/27/2016	review of burgess gj transcript motion	Case Administration	0.25
12/27/2016	team meeting	Case Development	1.75
12/28/2016	sending meeting notes to the group	Case Development	0.25
12/28/2016	review of sabein dep	Depositions	3.25
12/28/2016	f/u investigation	Background Investigation	0.25
12/29/2016	f/u expert binks/ f/u experts	Case Development	1
12/30/2016	gathering docs for dr. binks	Case Development	0.25
1/2/2017	team emails	Case Development	0.25
1/3/2017	team meeting re damages expert	Case Development	0.25
1/3/2017	review of Bagley dep	Depositions	1.5
1/4/2017	team meeting	Case Development	0.25
1/4/2017	call with Gayle and binks	Case Development	0.5
1/4/2017	review of Goldstein dep	Depositions	1
1/4/2017	review of patton/neverdon deps	Case Development	2.25
1/4/2017	call with opposing counsel	Case Administration	0.25
1/4/2017	gathering docs for murphy	Case Development, Experts	1
1/4/2017	review of Goia dep	Case Development	0.5
1/4/2017	reading 2011 postconviction transcript/does murphy need it	Case Development	0.5
1/4/2017	Howard rice notes; what do experts need	Case Development	1.25
1/4/2017	review of pc transcript	Case Development	0.5
1/4/2017	review of prison file	Case Development	0.5
1/5/2017	call with Gayle re sabein writ years ago	Case Development	0.5
1/5/2017	team emails	Case Development	0.5
1/5/2017	list of what we need from the "new" portions of the homicide file	Case Development	1.75
1/5/2017	identifying more wits to depose	Depositions	0.25
1/6/2017	review of BPD and ID rog responses	Written Discovery	1.25
1/9/2017	review of wagster/meinhardt dep outlines	Depositions	0.25
1/11/2017	review individual defendants' response to second and third interrogatories/ 37.1 letter	Written Discovery	1.25
1/11/2017	updating rog responses with new wits/discussion with grusin	Written Discovery, Case Development	0.25

1/11/2017	interrogatory responses with additional wits	Written Discovery	1.75
1/17/2017	finalizing letter to bpd	Written Discovery	0.75
1/17/2017	finalizing supplemental interrogatories	Written Discovery	0.5
1/17/2017	discussion with Gayle	Case Development	0.5
1/17/2017	rogs on the homicide file	Written Discovery	0.75
1/17/2017	call with sabein	Case Administration	0.25
1/17/2017	subpoena to bcsao re rice victims/synthesizing Howard Rice info	Case Development	2
1/17/2017	call with expert Brian murphy	Case Development	0.5
1/17/2017	subpoena to bcsao re rice victims/synthesizing Howard Rice info	Case Development	0.75
1/18/2017	subpoena to bcsao re rice victims/synthesizing Howard Rice inf	Case Development	0.25
1/20/2017	subpoena to bcsao re rice victims/synthesizing Howard Rice info	Case Development	4.5
1/26/2017	team meeting	Case Development	0.5
1/26/2017	f/u discovery	Written Discovery	0.25
1/30/2017	call with sabein re binks	Case Development	0.25
2/5/2017	404 (b) contact info	Case Development	0.75
2/17/2017	team emails	Case Development	0.25
2/17/2017	call with Gayle re burgess strategy/emailing re strategy	Case Development	0.5
2/20/2017	editing motion to compel	Pleadings	1.25
2/21/2017	prep for man dep	Depositions	1
2/22/2017	man dep	Depositions	1
2/24/2017	Howard rice summary	Case development	3
2/27/2017	f/u 404 (b) witnesses	Case Development	0.75
2/27/2017	ideas for the miller dep	Depositions	0.25
2/28/2017	team emails	Case Development	0.25
3/1/2017	Howard rice summary	Case Development	2.75
3/1/2017	review of documents related to bob Collins	Case Development	0.25
3/1/2017	Howard rice summary	Case Development	1.75
3/1/2017	review of documents related to bob Collins	Document Production	0.25
3/2/2017	draft affidavit for bob Collins	Case Development	1
3/2/2017	discussion of CAD with Gayle	Case Development	0.25
3/2/2017	f/u 404 (b) witnesses	Case Development	1
3/6/2017	correspondence from opposing counsel	Case Administration	0.25
3/7/2017	prep for Amanda Johnson deposition	Depositions	0.25
3/7/2017	deposition of Amanda Johnson	Depositions	1.5
3/9/2017	team emails	Case Development	0.25
3/10/2017	review of filings re disco dispute	Pleadings	0.25
3/13/2017	correspondence	Case Development	0.25
3/14/2017	Howard rice summary docs	Case Development	4
3/14/2017	team discussion of Rice and FOIA	Case Development	0.25
3/17/2017	team meeting	Case Development	0.25

3/22/2017	review of discovery responses re who was in homicide squad and who else to depose	Written Discovery	0.25
3/23/2017	draft letter to the court re Howard rice	Case Development	3
3/24/2017	draft letter to the court re Howard rice	Case Development	0.5
3/29/2017	review of grusin edits to Howard rice doc	Case Development	0.25
3/31/2017	review of Howard rice filing	Pleadings	0.25
4/3/2017	Gayle discussion	Case Development	0.25
4/11/2017	team meeting re damages expert	Case Development	0.5
4/13/2017	Howard rice info for mort	Case Development	0.25
5/5/2017	answering Gayle's questions about Howard rice	Case Development	0.75
5/10/2017	Discussion with Gayle	Case Development	0.25
5/11/2017	review of Patton/neverdon depositions for Steve	Depositions	0.25
5/15/2017	review of new Howard rice docs	Document Production	1
5/15/2017	review of new Howard rice docs	Document Production	0.25
6/9/2017	review of binks expert	Case Development	0.75
6/13/2017	binks call	Case Development	1
6/16/2017	review of Binks report	Case Development	0.5
6/22/2017	call with brain murphy	Case Development	0.75
6/22/2017	discussion with binks	Case Development	0.25
6/26/2017	review of murphy report	Case Development	0.25
6/27/2017	review of Gayle notes for murphy report	Case Development	0.25
6/27/2017	404 (b) materials for murphy report	Case Development	1.25
6/28/2017	gathering 404 (b) docs for Brian murphy	Case Development	0.75
6/28/2017	reviewing draft expert reports	Case Development	0.25
6/28/2017	calls with experts	Case Development	1
6/28/2017	reviewing draft expert reports	Case Development	0.25
6/29/2017	reviewing draft expert reports	Case Development	2
6/30/2017	reviewing draft expert reports	Case Development	2.25
8/2/2017	review of defendants' experts	Case Development	0.25
8/3/2017	review of defendants' experts	Case Development	0.75
8/3/2017	discussion of defendant expert reports	Case Development	0.5
8/4/2017	murphy prep	Depositions	0.25
8/4/2017	review of gsr expert report/counter report	Case Development	1
8/4/2017	GSR discussion with Sarah	Case Development	0.5
8/7/2017	prepping binks for dep	Depositions	1.25
8/8/2017	murphy rebuttal report	Case Development	1.5
8/10/2017	prep for Niemeyer rebuttal report	Case Development	0.5
8/10/2017	prep for Niemeyer rebuttal report/ discussion with Niemeyer	Case Development	1.75
8/11/2017	review of van Gelder dep	Depositions	3.5
8/15/2017	review of van Gelder trial testimony in prep for Niemeyer dep	Depositions	0.5
8/15/2017	review of van Gelder trial testimony and prior testimony in prep for Niemeyer dep	Depositions	1.25
8/15/2017	review of gsr docs for Niemeyer dep	Depositions	0.25

8/15/2017	review of gsr docs for Niemeyer dep (all docs sent to Niemeyer)	Depositions	2
8/15/2017	prep for Niemeyer dep--review of Knox arguments re kilty	Depositions	1
8/15/2017	review of Niemeyer draft rebuttal report	Case Development	0.25
8/16/2017	prep for Niemeyer dep--review of stine statements on GSR	Depositions	0.25
8/16/2017	prep for Niemeyer	Depositions	2
8/16/2017	Niemeyer rebuttal report	Case Development	0.25
8/18/2017	review of Niemeyer final rebuttal report	Case Development	0.25
8/18/2017	prep and deposition of Wayne Niemeyer	Depositions	7.75
8/22/2017	review of Knox report	Case Development	1.25
8/24/2017	Review of Niemeyer Dep	Case Development	0.5
8/24/2017	team call	Case Development	1
8/24/2017	Knox dep prep	Depositions	0.75
8/24/2017	supplemental rogs	Written Discovery	0.5
8/24/2017	Knox dep prep	Depositions	0.25
8/28/2017	discussion with team	Case Development	0.25
8/28/2017	supplementing interrogatories	Written Discovery	1.5
8/28/2017	Knox dep prep	Depositions	4
8/29/2017	Knox prep	Depositions	7.25
8/30/2017	Knox dep	Depositions	8
8/31/2017	prep for gaut	Depositions	1.5
8/31/2017	supplemental reports burgess	Case Development	0.25
9/1/2017	discussion of gaut with Gayle	Case Development	0.5
9/1/2017	gaut prep--review of Rainey dep	Depositions	0.75
9/1/2017	gaut prep--review of Rainey dep	Depositions	0.25
9/1/2017	prep for gaut--review of Towanda dep	Depositions	0.25
9/1/2017	prep for gaut review of materials--DSS records	Depositions	0.5
9/2/2017	prep for gaut	Depositions	1.5
9/4/2017	gaut prep	Depositions	1.25
9/4/2017	review of gaut subpoenaed docs	Case Development	1.5
9/5/2017	review of FBI/Touhy documents	Case Development	0.25
9/5/2017	gaut prep	Depositions	0.5
9/5/2017	gaut prep--review of Ron Dyson dep	Depositions	1
9/5/2017	prep for gaut dep with Arthur	Depositions	0.25
9/5/2017	exhibits for the gaut dep	Depositions	0.5
9/5/2017	exhibits for the gaut dep	Depositions	0.25
9/6/2017	Gaut dep	Depositions	7
9/7/2017	review of RTAs	Written Discovery	0.25
9/15/2017	review of 8 defendants' sj	Motion Practice	1.5
9/15/2017	review of van Gelder sj	Motion Practice	0.5
9/18/2017	review of added defendants sj	Motion Practice	0.5
9/18/2017	research fourth circuit individual defendant participation requirement/ joint and several liability	Case Development	0.75

9/20/2017	sj meeting	Case Development	0.5
9/20/2017	brain storming Howard rice section of sj response	Motion Practice	3
9/21/2017	review of Chavez homicide file for pretrial Howard rice knowledge	Case Development	0.25
9/21/2017	review of Hayes homicide file looking for pretrial Howard rice info	Case Development	1
9/21/2017	review of Goldstein dep for sj	Case Development	0.25
9/21/2017	review of troy Williams dep for Howard rice knowledge pretrial	Case Development	1.25
9/21/2017	review of 30 (b) (6) testimony for sj	Motion Practice	2.75
9/22/2017	review of Goldstein dep for sj	Motion Practice	0.75
9/22/2017	brain storming Howard rice section of sj response	Motion Practice	0.5
9/22/2017	review of Rainey dep for sj	Motion Practice	0.5
9/22/2017	brain storming Howard rice section of sj response	Motion Practice	0.5
9/25/2017	research on privacy act and Touhy requests	Case Development	1
9/25/2017	sj discussion with Gayle	Case Development	0.25
9/25/2017	research on privacy act and Touhy requests	Case Development	1.25
9/25/2017	brain storming Howard rice section of sj response	Motion Practice	0.75
9/25/2017	call with Gayle re Touhy	Case Development	0.25
9/25/2017	dealing with FBI docs	Case Development	0.5
9/26/2017	review of DEA docs	Case Development	0.25
9/26/2017	review of goia dep	Case Development	0.25
9/26/2017	review of evidence related to greenmount and pancake	Case Development	0.75
9/26/2017	review of Charles Dorsey's dep	Case Development	0.5
9/27/2017	review of purtell/sabein dep for sj/timing issue	Motion Practice	1.5
9/28/2017	review of Gayle's statement of facts	Motion Practice	0.25
9/28/2017	review of defendants responses to requests to admit	Motion Practice	0.75
9/28/2017	brainstorming ideas for lehmann	Motion Practice	0.50
10/1/2017	review of Patton deposition for sj	Motion Practice	1.00
10/1/2017	review of neverdon deposition for sj	Motion Practice	0.50
10/2/2017	Osborne claim research	Motion Practice	2.5
10/2/2017	discussion with Gayle	Motion Practice	0.25
10/2/2017	Osborne claim research	Motion Practice	2.25
10/3/2017	review of sj facts	Motion Practice	1
10/6/2017	review of Gayle sj draft	Motion Practice	1
10/6/2017	brainstorming sj ideas	Motion Practice	0.25
10/6/2017	summarizing defendants' Osborne claim	Motion Practice	0.25
10/6/2017	drafting Osborne claim section of sj	Motion Practice	3.5
10/7/2017	drafting Osborne claim section of sj	Motion Practice	1.25

10/7/2017	drafting paragraph on tayback and opening statement on drugs	Motion Practice	1
10/8/2017	sj edits	Motion Practice	0.5
10/9/2017	finding legal cites for sj	Motion Practice	4
10/9/2017	sj motion to seal for sj	Motion Practice	0.25
10/9/2017	legal research re inconsistent positions at sj and trial	Case Development	0.25
10/9/2017	adding legal cites for sj	Case Development	0.75
10/9/2017	editing sj facts	Motion Practice	1.5
10/9/2017	proofing argument section of sj	Motion Practice	2.75
10/12/2017	review responses to requests to admit	Admirto admitinies to requests to admitto admit	1
10/15/2017	burgess rta response letter	Lettergrgsponse letterrr	0.5
10/16/2017	review Amanda Johnson dep	DeApiaiJohnson depp	0.5
10/16/2017	gaut mil	trial preparation	0.5
10/16/2017	trying to locate Dorsey	trial preparation	0.5
10/16/2017	punitive damages	trial preparation	0.25
10/17/2017	gaut Daubert research	trial preparation	0.75
10/17/2017	following up on punitive damages disco	Trial Preparation	0.25
10/17/2017	MIL re undisclosed wits	Trial Preparation	0.25
10/17/2017	team meeting	Case Development	0.75
10/17/2017	correspondence re wits	Case Development	0.25
10/17/2017	review gaut transcript	Trial Preparation	0.5
10/18/2017	review gaut transcript	Trial Preparation	0.25
10/18/2017	review gaut transcript	Trial Preparation	0.5
10/18/2017	research gaut mil legal conclusions	Trial Preparation	0.25
10/18/2017	research gaut mil credibility determinations	Trial Preparation	0.5
10/18/2017	correspondence re trial wits-shack, goia, doory	Trial Preparation	0.25
10/18/2017	research gaut mil credibility determinations	Trial Preparation	0.25
10/18/2017	Amanda Johnson mil	Trial Preparation	0.25
10/18/2017	research gaut mil credibility determinations	Trial Preparation	0.25
10/18/2017	research gaut legal conclusion	Trial Preparation	0.75
10/18/2017	review of local rules re trial and jury instructions	Trial Preparation	0.25
10/18/2017	review of fpto	Trial Preparation	0.25
10/19/2017	mil re arrests and convictions	Trial Preparation	1.25
10/19/2017	correspondence with team	Case Development	0.25
10/19/2017	drafting arrests and convictions mil	Trial Preparation	0.75
10/19/2017	tony g prep	Trial Preparation	1
10/19/2017	writs of habeas corpus ad testificandum	Trial Preparation	0.25
10/19/2017	tony g prep discussion with tony	Trial Preparation	0.25
10/19/2017	correspondence with team	Case Development	0.25
10/19/2017	research re writ ad testificandum	Trial Preparation	0.5
10/19/2017	drafting arrests and convictions mil	Trial Preparation	0.25
10/19/2017	undisclosed witness mil	Trial Preparation	0.75
10/20/2017	drafting gaut mil	Trial Preparation	2.75

10/20/2017	draft mil re wits with no foundation	Trial Preparation	0.5
10/20/2017	draft mil re wits Amanda Johnson and Kenneth man	Trial Preparation	0.75
10/20/2017	correspondence with team	Case Development	0.25
10/20/2017	draft mil re man	Trial Preparation	0.25
10/20/2017	editing mils	Trial Preparation	3.75
10/20/2017	drafting motion to bar Kenneth mann	Trial Preparation	0.5
10/20/2017	editing mils	Trial Preparation	4
10/22/2017	review of defendant mils	Trial Preparation	0.5
10/23/2017	research re jury instructions	Trial Preparation	0.25
10/23/2017	witness prep	Trial Preparation	0.25
10/23/2017	MIL Response: Stine	Trial Preparation	0.5
10/23/2017	MIL Response: Stine	Trial Preparation	0.5
10/23/2017	correspondence with the team	Case Development	0.25
10/23/2017	witness discussion	Trial Preparation	0.25
10/23/2017	MIL Response: Stine	Trial Preparation	0.25
10/23/2017	review defendants FBI mil	Trial Preparation	0.25
10/23/2017	f/u ideas on FBI docs--detect phone number at Baltimore homicide	Trial Preparation	0.5
10/23/2017	review of FBI MIL	Trial Preparation	0.5
10/23/2017	review of Ron Dyson dep	Trial Preparation	0.25
10/23/2017	review of defendants Dorsey mil	Trial Preparation	0.25
10/23/2017	review defendants mil re evidence not disclosed in disco	Trial Preparation	0.25
10/23/2017	review of Ron Dyson dep	Trial Preparation	0.5
10/24/2017	call with Niemeyer	Trial Preparation	0.25
10/24/2017	mil discussion with danielle and anne	Trial Preparation	0.25
10/24/2017	review of notes on Brian Rainey	Trial Preparation	0.25
10/24/2017	discussion with Gayle re prepping witnesses	Trial Preparation	0.75
10/24/2017	discussion with jl	Trial Preparation	0.25
10/24/2017	handy neverdon mil research on hearsay	Trial Preparation	1.5
10/24/2017	discussion of sabein prep	Trial Preparation	0.25
10/24/2017	handy neverdon mil research on hearsay	Trial Preparation	1.25
10/24/2017	review of Niemeyer mil	Trial Preparation	0.5
10/24/2017	review of kilty dep for Niemeyer mil response	Trial Preparation	0.25
10/24/2017	review of Niemeyer articles relied up on in rebuttal report for Niemeyer mil/review of Niemeyer dep for response to Niemeyer mil	Trial Preparation	2.25
10/25/2017	travel to Baltimore to see witnesses Dyson lashanda folkes Ron Dyson & louis mccalister taylor	Trial Preparation	12
10/26/2017	Niemeyer mil response	Trial Preparation	1
10/26/2017	review of danielle's work on stine	Trial Preparation	0.25
10/26/2017	cites for sj hearing	Motion Practice	0.25
10/26/2017	review of danielle's work on stine	Trial Preparation	0.25

10/26/2017	Dorsey discussion with Steve	Trial Preparation	0.5
10/26/2017	drafting response to FBI 302 mil	Trial Preparation	0.25
10/26/2017	mil response handy and wilson reports	Trial Preparation	1.25
10/26/2017	team discussion	Trial Preparation	0.5
10/26/2017	mil response handy and wilson reports	Trial Preparation	0.5
10/27/2017	mil response handy and wilson reports	Trial Preparation	0.75
10/27/2017	stine mil response	Trial Preparation	1.5
10/27/2017	discussion with Gayle	Trial Preparation	1
10/27/2017	editing motion in limine responses	Trial Preparation	2.25
10/27/2017	editing motion in limine responses	Trial Preparation	0.5
10/27/2017	review of defendants' mil responses	Trial Preparation	0.25
10/28/2017	discussion of sabein prep with Gayle	Trial Preparation	0.5
10/28/2017	correspondence with the team	Trial Preparation	0.25
10/28/2017	defendant dep designations	Trial Preparation	2
10/28/2017	correspondence with the team	Trial Preparation	0.25
10/28/2017	defendant dep designations	Trial Preparation	1.25
10/29/2017	defendant dep designations	Trial Preparation	3.5
10/30/2017	review of danielle memo on 801 (d)	Trial Preparation	0.25
10/30/2017	review of latasha dep	Trial Preparation	0.25
10/30/2017	discussion with jon and Gayle	Trial Preparation	0.25
10/30/2017	call with joe stine	Trial Preparation	0.25
10/30/2017	check of defendant exhibits	Trial Preparation	0.25
10/30/2017	correspondence with the team	Trial Preparation	0.25
10/30/2017	defendant dep designations	Trial Preparation	2.25
10/30/2017	review of latasha dep	Trial Preparation	0.5
10/30/2017	correspondence for tawanda and lashanda	Trial Preparation	0.25
10/30/2017	finalizing fpto	Trial Preparation	0.25
10/30/2017	review of latasha dep	Trial Preparation	0.25
10/30/2017	preparation for final pretrial conference	Trial Preparation	0.5
10/30/2017	review of lashanda dep	Trial Preparation	0.5
10/30/2017	finalizing fpto	Trial Preparation	0.75
10/30/2017	review of defendant responses to motions in limine	Trial Preparation	0.25
10/30/2017	correspondence with the team	Trial Preparation	0.5
10/31/2017	review of defendant mil responses	Trial Preparation	1.25
10/31/2017	correspondence with the team	Trial Preparation	0.25
10/31/2017	team call and correspondence with the team	Trial Preparation	0.75
10/31/2017	prep for Knox argument	Trial Preparation	0.75
10/31/2017	review of sj ruling	Pleadings	0.5
11/1/2017	seven hours travel, 2.5 hour pretrial conference, two hours prepping with the team, one hour with tawanda and Brian	Trial Preparation	12.5
11/2/2017	proposed voir dire	Trial Preparation	0.75
11/3/2017	review of jury instructions	Trial Preparation	0.25
11/3/2017	review of sabein outline	Trial Preparation	0.5
11/5/2017	damages prep	Trial Preparation	3

11/5/2017	review culotta dep	Trial Preparation	0.75
11/6/2017	trial day	Trial Preparation	8
11/7/2017	trial day	Trial Preparation	6.5
11/7/2017	discussion with Gayle and tony re shawn ambrust, kilty, van Gelder	Trial Preparation	1
11/7/2017	sabria direct	Trial Preparation	1
11/7/2017	discussion with shavonda	Trial Preparation	0.75
11/7/2017	discussion with jon and tony re gsr facts	Trial Preparation	0.25
11/8/2017	discussion with team	Trial Preparation	1.5
11/8/2017	prepping sabria	Trial Preparation	1
11/8/2017	trial day	Trial	7.5
11/9/2017	trial day	Trial	7.5
11/9/2017	review of sentencing transcript for redactions	Trial	0.5
11/9/2017	team meeting	Trial	1
11/9/2017	points for closing	Trial	0.5
11/10/2017	correspondence with team	Trial	0.5
11/10/2017	preparing Rainey exam	Trial	0.25
11/10/2017	correspondence with wits friedman and ag's office	Trial	0.25
11/10/2017	preparing Rainey exam	Trial	2.5
11/10/2017	review of stine dep	Trial	1.25
11/10/2017	research re butch hodgson phone number at bpd	Trial	0.25
11/10/2017	review of stine dep	Trial	0.5
11/12/2017	correspondence with team	Trial	0.25
11/12/2017	contacting witnesses	Trial	0.25
11/12/2017	review of stine dep	Trial	0.25
11/12/2017	review of stine report	Trial	0.5
11/12/2017	prep with stine	Trial	0.75
11/12/2017	prep with patrice	Trial	0.75
11/12/2017	review of Goldstein and Dyson outlines	Trial	0.75
11/12/2017	review of meinhardt testimony and points for cross	Trial	1
11/13/2017	trial day and team meeting	Trial	8
11/13/2017	prepping with tawanda and Brian	Trial	2
11/13/2017	review of Brian dep	Trial	1
11/13/2017	review of jon's edits to Rainey exam	Trial	0.25
11/13/2017	contacting witnesses	Trial	0.25
11/13/2017	review of Brian dep	Trial	0.25
11/14/2017	trial day	Trial	8
11/14/2017	prep of Brian/ gioia stip	Trial	1
11/15/2017	team meeting	Trial	1
11/15/2017	tawanda direct exam	Trial	1
11/15/2017	review binks exam	Trial	0.25
11/15/2017	coordinating witness meetings	Trial	0.25
11/15/2017	trial day	Trial	6.5

11/16/2017	trial day	Trial	7
11/17/2017	trial day and team meeting	Trial	9
11/19/2017	gaut proffer	Trial	1.75
11/19/2017	review of goldstein transcript for closing	Trial	0.25
11/19/2017	redactions to criminal trial transcript pp 300-600	Trial	2
11/19/2017	review of goldstein transcript for closing	Trial	1.5
11/19/2017	review of lashanda folkes dep	Trial	0.5
11/19/2017	review of goldstein transcript for closing	Trial	1.5
11/19/2017	points for demonstratives	Trial	0.25
11/20/2017	trial day	Trial	8
11/20/2017	team work on demonstratives and closing and exhibits	Trial	3
11/21/2017	closings and jury instructions	Trial	5
1/17/2018	ptm meeting	Post-Trial	0.45
1/19/2018	research re guidepost jury instruction	Post-Trial	0.4
1/23/2018	review ji conf transcript for posttrial motion	Post-Trial	0.1
1/25/2018	revisions and legal cites for post trial motion	Post-Trial	5.95
1/25/2018	revisions to post trial motion	Post-Trial	1.5
1/26/2018	cite checking ptm response	Post-Trial	0.25
3/12/2018	review of ptm order	Post-Trial	0.4
5/2/2018	research re amending the judgment to include bpd	Post-Trial	0.25
7/2/2018	review of appellate brief	Post-Trial	1.1
7/11/2018	prep for burgess appellate meeting	Post-Trial	0.5
7/11/2018	appellate meeting	Post-Trial	1
1/28/2019	prep for burgess moot	Post-Trial	2.5
1/29/2019	moot jon	Post-Trial	1
1/31/2019	review of 4c argument	Post-Trial	1
3/6/2019	team meeting	Post-Trial	0.75
3/6/2019	research re rule 54 b	Post-Trial	1.6
3/7/2019	draft supplemental briefing on jurisdiction	Post-Trial	1
3/8/2019	draft supplemental briefing on jurisdiction	Post-Trial	1.75
3/8/2019	research re what counts as a final judgment	Post-Trial	0.2
3/9/2019	research re what counts as a final judgment	Post-Trial	2
3/11/2019	finalizing supplemental brief	Post-Trial	1.5
3/11/2019	review of JL draft re jurisdictional statement	Post-Trial	0.1
3/11/2019	review of defendants' jurisdictional finding	Post-Trial	0.2
3/11/2019	revising latest jurisdictional filing draft	Post-Trial	0.5
4/2/2019	review trial testimony re monell evidence	Post-Trial	1.25
4/3/2019	review trial testimony re monell evidence	Post-Trial	4.98
4/4/2019	review trial testimony re monell evidence	Post-Trial	0.2
4/5/2019	research response to mtn to find monell claim moot	Post-Trial	0.3

4/8/2019	research response to mtn to find monell claim moot	Post-Trial	1.75
4/9/2019	research response to mtn to find monell claim moot	Post-Trial	2.5
4/11/2019	research response to mtn to find monell claim moot	Post-Trial	1
4/18/2019	research response to mtn to find monell claim moot	Post-Trial	1.25
4/18/2019	draft response to bpd motion to dismiss monell	Post-Trial	1
4/22/2019	draft response to bpd motion to dismiss monell	Post-Trial	1.75
4/22/2019	research re consent decree for BPD	Post-Trial	0.5
4/22/2019	draft response to bpd motion to dismiss monell	Post-Trial	0.75
4/25/2019	draft response to bpd motion to dismiss monell	Post-Trial	2
4/25/2019	draft response to bpd mtd	Post-Trial	2
4/26/2019	mtd response	Post-Trial	0.75
4/29/2019	draft response to bpd motion to dismiss monell	Post-Trial	5.5
5/31/2019	review of district court ruling on monell	Post-Trial	0.05
6/18/2019	discussion with jon and steve	Post-Trial	0.2
6/19/2019	review of steve draft filing	Post-Trial	0.05
6/19/2019	review of steve draft filing/review of JI transcript	Post-Trial	1
6/21/2019	review of goldstein 4th circuit reply	Post-Trial	0.2
8/23/2019	review of opening brief	Post-Trial	0.1
8/29/2019	review of goldstein opening brief	Post-Trial	0.5
8/30/2019	comments for jon re appeal	Post-Trial	0.05
10/2/2019	editing the appellate brief	Post-Trial	1.5
10/2/2019	editing the appellate brief	Post-Trial	0.75
10/3/2019	finding a cite	Post-Trial	0.5
11/26/2019	draft motion for extension of time	Post-Trial	0.5
5/14/2021	review of appellate decision	Post-Trial	0.5
10/27/2021	fee petition	Fee Petition Preparation	0.08
	TOTAL HOURS		749.96

Tony Balkissoon			
Date	Description	Category	Duration
10/19/2016	Burgess: initial case review	background investigation	7:32:31
10/20/2016	Burgess: initial case review	background investigation	1:21:00
10/20/2016	Burgess: initial case review	background investigation	2:15:48
10/21/2016	Burgess: initial case review	background investigation	2:29:18
10/23/2016	Burgess: prep for Bagley discussion	depositions	2:34:56
10/24/2016	Burgess: prep for Bagley discussion	depositions	2:35:03
10/24/2016	Burgess: prep for Bagley discussion	depositions	5:07:00
10/24/2016	Burgess: prepare for depositions	depositions	0:50:06
10/27/2016	Burgess: prepare for Bagley deposition	depositions	0:07:40
10/27/2016	Burgess: prepare for Bagley deposition	depositions	1:59:43
10/27/2016	Burgess: prepare for Bagley deposition	depositions	0:21:41
10/28/2016	Burgess: prepare for Bagley deposition	depositions	5:00:03
11/1/2016	Burgess: prep for Shabria dep	depositions	0:47:23
11/2/2016	Burgess: prep for Shabria dep	depositions	2:30:58
11/2/2016	Burgess: Weese dep prep	depositions	1:00:32
11/2/2016	Burgess: follow up re document discovery	written discovery	0:14:25
12/21/2016	Burgess: draft/revise motion to release grand jury transcript	pleadings	1:31:00
12/21/2016	Burgess: draft/revise motion to release grand jury transcript	pleadings	4:28:27
12/27/2016	Burgess: team meeting	case development	1:40:00
12/28/2016	Burgess: draft/revise motion to release grand jury transcript	pleadings	0:42:15
12/29/2016	Burgess: review deposition of Sabein Burgess	case development	0:30:01
12/30/2016	Burgess: review deposition of Sabein Burgess	case development	1:10:40
12/30/2016	Burgess: review deposition of Sabein Burgess	case development	0:29:54
1/2/2017	Burgess: review deposition of Sabein Burgess	case development	1:02:20
1/2/2017	Burgess: review deposition of Sabein Burgess	case development	0:31:38
1/3/2017	Burgess: review deposition of Sabein Burgess	case development	0:56:04
1/9/2017	Burgess: draft/revise motion to disclose grand jury testimony	pleadings	0:12:31
1/9/2017	Burgess: review/analyze email from Tess re follow up on Ds' interrogatory responses	case administration	0:02:31
1/9/2017	Burgess: draft/revise motion to disclose grand jury testimony	pleadings	0:39:19
1/11/2017	Burgess: review/analyze correspondence from GH re recent depositions	case administration	0:04:48
1/12/2017	Burgess: review/revise correspondence regarding discovery disputes	case administration	0:24:24

1/18/2017	Burgess: review letter from opposing counsel re re-opening depositions	case administration	0:04:03
1/26/2017	Burgess: draft letter to court re grand jury transcripts	case administration	0:24:34
1/26/2017	Burgess: meet GH, SA, SG, TK re tasks	case administration	0:23:33
2/7/2017	Burgess: follow up on grand jury request	case administration	0:22:03
2/13/2017	Burgess: follow up on grand jury request	case administration	0:19:50
2/22/2017	Burgess: follow up on grand jury request	case administration	0:07:33
2/22/2017	Burgess: follow up on grand jury request	case administration	0:07:28
2/28/2017	Burgess: follow up on grand jury request	case administration	1:10:28
3/1/2017	Burgess: follow up on grand jury request	case administration	0:05:14
3/3/2017	Burgess: follow up on grand jury request	case administration	0:06:48
3/14/2017	Burgess: file motion to unseal grand jury	pleadings	0:12:50
3/14/2017	Burgess: review Howard Rice timeline for FOIA dispute	case development	0:09:08
3/15/2017	Burgess: review Howard Rice timeline for FOIA dispute	case development	0:34:36
3/15/2017	Burgess: call with Court	case administration	1:17:31
3/17/2017	Burgess: call with GH, SA, TK, SG re Howard Rice files	case administration	0:18:28
3/24/2017	Burgess: revise/edit Howard Rice brief to court	pleadings	0:34:59
4/17/2017	Burgess: draft proposed order re grand jury transcripts	pleadings	0:15:12
5/11/2017	Burgess: review/analyze Weese dep; prepare for Weese supplemental dep	depositions	0:51:59
5/15/2017	Burgess: review/analyze Weese dep; prepare for Weese supplemental dep	depositions	3:18:23
5/15/2017	Burgess: review/analyze Weese dep; prepare for Weese supplemental dep	depositions	4:21:25
5/16/2017	Burgess: review/analyze docs produced by FBI re Howard Rice	case development	3:56:35
5/16/2017	Burgess: review/analyze docs produced by FBI re Howard Rice	case development	1:12:11
5/16/2017	Burgess: prepare for upcoming deps with SL and call with GH	depositions	0:39:00
5/17/2017	Burgess: prepare for upcoming depositions	depositions	0:10:57
5/17/2017	Burgess: prepare for upcoming depositions	depositions	1:10:00
5/17/2017	Burgess: prepare for upcoming depositions	depositions	0:03:51
5/17/2017	Burgess: prepare for upcoming depositions	depositions	0:24:54
5/17/2017	Burgess: prepare for upcoming depositions	depositions	4:06:27
5/18/2017	Burgess: prepare for Skinner dep	depositions	5:30:00
5/18/2017	Burgess: Palmere dep	depositions	5:30:00
5/19/2017	Burgess: prepare for and take Skinner dep	depositions	10:26:04
5/20/2017	Burgess: prepare for Ritz deposition	depositions	0:48:59
5/21/2017	Burgess: prepare for re-depositions of defendants	depositions	0:07:52

5/21/2017	Burgess: prepare for re-depositions of defendants	depositions	2:16:53
5/21/2017	Burgess: prepare for re-depositions of defendants	depositions	0:00:00
5/21/2017	Burgess: prepare for re-depositions of defendants	depositions	0:00:00
5/21/2017	Burgess: prepare for re-depositions of defendants	depositions	2:29:25
5/22/2017	Burgess: prepare for re-depositions of defendants	depositions	0:27:12
5/22/2017	Burgess: prepare for re-depositions of defendants	depositions	5:07:10
5/22/2017	Burgess: Ritz re dep	depositions	1:00:00
5/22/2017	Burgess: prepare for re-depositions of defendants	depositions	1:15:00
5/22/2017	Burgess: prepare for re-depositions of defendants	depositions	1:57:01
5/22/2017	Burgess: prepare for re-depositions of defendants	depositions	0:32:26
5/23/2017	Burgess: prepare for re-depositions of defendants	depositions	0:41:41
5/23/2017	Burgess: prepare for re-depositions of defendants	depositions	5:49:09
5/23/2017	Burgess: prepare for and take deps of Neverdon, Patton, and Purtell	depositions	3:03:53
5/25/2017	Burgess: prepare for and take Weese second deposition	depositions	4:12:45
5/25/2017	Burgess: prepare for Willis dep	depositions	1:56:57
5/25/2017	Burgess: prepare for Willis dep	depositions	3:11:31
5/26/2017	Burgess: prepare for Willis dep	depositions	2:55:20
5/26/2017	Burgess: Louis Taylor deposition	depositions	1:50:18
5/26/2017	Burgess: prepare for Willis dep	depositions	0:57:10
5/26/2017	Burgess: prepare for and take Willis dep	depositions	3:15:52
5/30/2017	Burgess: prepare for Brooks and Williams deps	depositions	0:25:44
5/30/2017	Burgess: prepare for Brooks and Williams deps	depositions	0:03:39
5/30/2017	Burgess: prepare for Brooks and Williams deps	depositions	2:11:42
5/30/2017	Burgess: review/analyze draft expert report	case development	0:00:02
5/30/2017	Burgess: review/analyze draft expert report	case development	0:53:41
5/30/2017	Burgess: prepare for Brooks and Williams deps	depositions	0:00:42
5/31/2017	Burgess: prepare for Brooks and Williams deps	depositions	2:51:00
6/1/2017	Burgess: prepare for Brooks dep	depositions	1:36:51
6/1/2017	Burgess: Brooks dep	depositions	3:25:07

6/5/2017	Burgess: prepare for and take Troy Williams deposition	depositions	0:58:16
6/5/2017	Burgess: prepare for and take Troy Williams deposition	depositions	4:02:51
6/5/2017	Burgess: Troy Williams dep	depositions	3:20:00
6/5/2017	Burgess: prepare for Johnson dep	depositions	1:56:33
6/6/2017	Burgess: prepare for and take Johnson dep	depositions	6:28:02
6/9/2017	Burgess: research SJ issue with multiple officers	case development	0:23:47
6/19/2017	Burgess: draft motion for extension of expert discovery deadlines	pleadings	0:35:58
6/27/2017	Burgess: review/analyze Murphy report	case development	1:09:24
6/28/2017	Burgess: review/analyze Murphy report	case development	0:05:54
6/28/2017	Burgess: review/analyze Binks report	case development	0:17:37
6/28/2017	Burgess: review/analyze GSR report	case development	1:15:12
6/28/2017	Burgess: review/analyze Rice documents for expert discovery	case development	0:36:36
6/28/2017	Burgess: review/analyze Rice documents for expert discovery	case development	0:24:37
6/29/2017	Burgess: draft/review expert reports	case development	0:07:55
6/29/2017	Burgess: draft/review expert reports	case development	1:17:04
6/30/2017	Burgess: draft/revise expert disclosure documents	case development	3:47:33
6/30/2017	Burgess: draft/revise expert disclosure documents	case development	1:35:48
7/11/2017	Burgess: review/analyze draft expert report, find record support	case development	4:40:18
7/12/2017	Burgess: review/analyze draft expert report, find record support	case development	0:04:06
7/13/2017	Burgess: review record for police practices expert report	case development	1:11:19
7/14/2017	Burgess: review record for police practices expert report	case development	6:39:03
7/25/2017	Burgess: call with SB re IME	case administration	0:16:17
8/5/2017	Burgess: read defendants' expert reports	case development	1:16:51
8/7/2017	Burgess: read/analyze reports and documents to prepare for Stine deposition defense	depositions	1:20:00
8/7/2017	Burgess: call with Stine and GH to prepare for deposition	depositions	2:25:30
8/7/2017	Burgess: read/analyze reports and documents to prepare for Binks deposition defense	depositions	0:09:43
8/7/2017	Burgess: read/analyze reports and documents to prepare for Binks deposition defense	depositions	1:46:00

8/7/2017	Burgess: call with TK GH and Dr. Binks to prep for deposition	depositions	1:01:00
8/8/2017	Burgess: read/analyze reports and documents to prepare for Stine deposition defense	depositions	1:00:11
8/8/2017	Burgess: read/analyze reports and documents to prepare for Stine deposition defense	depositions	1:30:21
8/8/2017	Burgess: Stine defense	depositions	6:36:56
8/8/2017	Burgess: analyze Stine depo and summarize for team, prepare for Binks defense	depositions	0:56:49
8/9/2017	Burgess: prepare for and do Binks defense	depositions	5:26:38
8/16/2017	Burgess: review Ds' supp. expert reports	case development	0:21:32
8/17/2017	Burgess: review Ds' supp. expert reports	case development	1:44:13
8/17/2017	Burgess: review/analyze Kilty report to prepare for deposition	depositions	0:38:03
8/18/2017	Burgess: prepare for Kilty depo	depositions	0:16:00
8/22/2017	Burgess: call with SA and GH re expert discovery	case development	0:40:00
8/23/2017	Burgess: review/analyze Gaut report	case development	0:38:33
8/23/2017	Burgess: review/analyze Gaut report	case development	0:04:47
8/23/2017	Burgess: review/analyze Gaut report	case development	0:53:47
8/23/2017	Burgess: review/analyze Gaut report	case development	0:42:32
8/23/2017	Burgess: respond to Kilty subpoena	document production	0:04:45
8/23/2017	Burgess: respond to Kilty subpoena	document production	2:41:57
8/24/2017	Burgess: review/analyze draft RTAs	written discovery	0:36:25
8/24/2017	Burgess: prepare for Kilty depo	depositions	0:30:00
8/24/2017	Burgess: call with SA and GH and TK re experts	case development	0:56:26
8/24/2017	Burgess: prepare for Kilty depo	depositions	0:49:42
8/24/2017	Burgess: review/analyze draft RTAs	written discovery	0:42:42
8/25/2017	Burgess: review Kilty's file for privilege	document production	0:52:04
8/25/2017	Burgess: review Kilty's file for privilege	document production	1:03:47
8/25/2017	Burgess: review Kilty's file for privilege	document production	0:44:08
8/25/2017	Burgess: prepare for Kilty depo	depositions	1:20:29
8/25/2017	Burgess: prepare for Kilty depo	depositions	2:03:37
8/25/2017	Burgess: prepare for Kilty depo	depositions	1:22:31
8/26/2017	Burgess: prepare for Kilty depo	depositions	0:27:18
8/26/2017	Burgess: prepare for Kilty depo	depositions	0:19:30
8/26/2017	Burgess: prepare for Kilty depo	depositions	0:38:11
8/27/2017	Burgess: prepare for Kilty depo	depositions	1:41:17
8/27/2017	Burgess: prepare for Kilty depo	depositions	1:42:50
8/27/2017	Burgess: prepare for Kilty depo	depositions	1:33:03
8/27/2017	Burgess: review/analyze notes on Culotta's examination for call with Dr. Binks	case development	0:09:53
8/28/2017	Burgess: prepare for Kilty depo	depositions	3:12:25
8/28/2017	Burgess: defend Kilty depo; take depo	depositions	7:41:10

8/29/2017	Burgess: draft/revise Knox outline	case development	0:02:22
8/29/2017	Burgess: draft/revise Knox outline	case development	1:31:55
8/29/2017	Burgess: draft/revise Binks rebuttal report	pleadings	0:36:06
8/30/2017	Burgess: call with Dr. Binks re Culotta deposition	depositions	0:52:32
8/30/2017	Burgess: prepare for Williams depo	depositions	1:28:26
8/30/2017	Burgess: call re decoding FBI documents	case development	0:36:47
8/30/2017	Burgess: prepare for Williams depo	depositions	0:16:14
8/30/2017	Burgess: prepare for Williams depo	depositions	4:26:45
8/31/2017	Burgess: draft/revise Binks rebuttal report	pleadings	1:09:18
8/31/2017	Burgess: draft/revise Binks rebuttal report	pleadings	0:20:18
8/31/2017	Burgess: draft/revise Stine rebuttal report	pleadings	0:35:43
8/31/2017	Burgess: prepare for Williams depo	depositions	0:48:03
8/31/2017	Burgess: prepare for Williams depo	depositions	3:51:47
8/31/2017	Burgess: prepare for Williams depo	depositions	2:22:23
9/1/2017	Burgess: take Williams depo	depositions	7:00:21
9/4/2017	Burgess: review/analyze new discovery answers from defendants	written discovery	0:44:19
9/4/2017	Burgess: prepare for Culotta dep	depositions	0:32:33
9/5/2017	Burgess: draft/revise Gaut outline	depositions	0:39:48
9/6/2017	Burgess: prepare for Culotta dep	depositions	0:17:02
9/6/2017	Burgess: prepare for Culotta dep	depositions	0:04:51
9/6/2017	Burgess: prepare for Culotta dep	depositions	3:45:03
9/6/2017	Burgess: prepare for Culotta dep	depositions	0:34:58
9/7/2017	Burgess: prepare for Culotta dep	depositions	0:22:44
9/7/2017	Burgess: prepare for Culotta dep	depositions	2:55:43
9/7/2017	Burgess: prepare for and take Culotta dep	depositions	6:51:10
9/7/2017	Burgess: draft correspondence to team re Culotta deposition	depositions	0:27:55
9/7/2017	Burgess: draft/revise response to RTA for Weese	written discovery	0:21:13
9/9/2017	Burgess: draft/revise responses to RTAs	written discovery	2:32:05
9/9/2017	Burgess: draft/revise responses to RTAs	written discovery	0:13:56
9/10/2017	Burgess: draft/revise responses to RTAs	written discovery	1:25:36
9/10/2017	Burgess: draft/revise responses to RTAs	written discovery	0:37:58
9/10/2017	Burgess: draft/revise responses to RTAs	written discovery	0:11:11
9/11/2017	Burgess: draft/revise responses to RTAs	written discovery	0:57:14
9/11/2017	Burgess: draft/revise responses to RTAs	written discovery	0:29:15
9/19/2017	Burgess: review/analyze Ds' SJ papers	case development	0:27:02
9/19/2017	Burgess: review/analyze Ds' SJ papers	case development	0:19:09
9/19/2017	Burgess: review/analyze Ds' SJ papers	case development	0:19:33
9/19/2017	Burgess: review/analyze Ds' SJ papers	case development	1:37:53
9/19/2017	Burgess: review/analyze Ds' SJ papers	case development	0:29:39
9/20/2017	Burgess: review/analyze Ds' SJ papers	case development	6:14:52
9/20/2017	Burgess: review/analyze Ds' SJ papers	case development	0:45:20
9/21/2017	Burgess: review/analyze Ds' SJ papers and research cited law	case development	2:02:06

9/21/2017	Burgess: review/analyze Ds' SJ papers and research cited law	case development	0:23:31
9/21/2017	Burgess: analyze Culotta articles	case development	0:11:34
9/21/2017	Burgess: review/analyze Ds' SJ papers and research cited law	case development	0:17:25
9/21/2017	Burgess: review/analyze Ds' SJ papers and research cited law	case development	1:26:05
9/27/2017	Burgess: call with James Bagley re identifications	case development	0:56:22
9/28/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	0:58:57
9/28/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	1:10:53
9/28/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	0:49:51
9/28/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	3:10:44
9/29/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	1:30:13
9/29/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	1:50:54
9/29/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	2:19:29
9/30/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	1:08:59
9/30/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	0:20:20
9/30/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	1:27:40
9/30/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	1:08:00
10/2/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	1:04:46
10/2/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	3:10:37
10/2/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	0:56:22
10/3/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	1:07:59
10/3/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	0:42:29
10/3/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	3:14:14
10/3/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	0:49:52
10/3/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	0:57:39

10/3/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	0:01:42
10/3/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	0:31:04
10/3/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	0:52:05
10/4/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	1:52:43
10/4/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	1:07:16
10/4/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	0:20:24
10/4/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	1:21:52
10/4/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	2:47:54
10/5/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	3:42:48
10/5/2017	Burgess: research/draft/revise SJ response for DVG	pleadings	4:33:03
10/5/2017	Burgess: research/draft/revise SJ responses	pleadings	0:07:22
10/5/2017	Burgess: research/draft/revise SJ responses	pleadings	2:24:15
10/6/2017	Burgess: research/draft/revise SJ responses	pleadings	0:18:25
10/6/2017	Burgess: research/draft/revise SJ responses	pleadings	3:07:02
10/6/2017	Burgess: research/draft/revise SJ responses	pleadings	4:13:46
10/6/2017	Burgess: research/draft/revise SJ responses	pleadings	4:32:55
10/7/2017	Burgess: research/draft/revise SJ responses	pleadings	1:03:56
10/7/2017	Burgess: research/draft/revise SJ responses	pleadings	1:29:36
10/7/2017	Burgess: research/draft/revise SJ responses	pleadings	6:04:37
10/8/2017	Burgess: research/draft/revise SJ responses	pleadings	1:10:36
10/8/2017	Burgess: research/draft/revise SJ responses	pleadings	5:02:45
10/8/2017	Burgess: research/draft/revise SJ responses	pleadings	0:40:21
10/9/2017	Burgess: research/draft/revise SJ responses	pleadings	1:39:28
10/9/2017	Burgess: research/draft/revise SJ responses	pleadings	9:58:02
10/9/2017	Burgess: research/draft/revise SJ responses	pleadings	0:49:27
10/9/2017	Burgess: research/draft/revise SJ responses	pleadings	6:19:02
10/10/2017	Burgess: research/draft/revise SJ responses	pleadings	3:56:48
10/10/2017	Burgess: research/draft/revise SJ responses	pleadings	0:05:49
10/11/2017	Burgess: draft/revise letter re RTA responses	written discovery	1:29:57
10/12/2017	Burgess: draft/revise letter re RTA responses	written discovery	0:39:36
10/12/2017	Burgess: draft/revise letter re RTA responses	written discovery	1:55:23
10/15/2017	Burgess: trial prep (respond to RTAs, prepare witnesses for testimony, prepare FPTO)	trial preparation	1:46:56

10/15/2017	Burgess: trial prep (respond to RTAs, prepare witnesses for testimony, prepare FPTO)	trial preparation	2:12:39
10/16/2017	Burgess: draft/revise letter re RTA responses	written discovery	2:16:13
10/16/2017	Burgess: draft/revise letter re RTA responses	written discovery	0:43:15
10/16/2017	Burgess: prepare for deposition of Rakim Mohammed	depositions	2:00:08
10/16/2017	Burgess: prepare for deposition of Rakim Mohammed	depositions	0:59:21
10/16/2017	Burgess: prepare for deposition of Rakim Mohammed	depositions	1:47:14
10/16/2017	Burgess: draft letter re Defendants' deficient RTA responses	written discovery	2:42:18
10/17/2017	Burgess: draft letter re Defendants' deficient RTA responses	written discovery	0:14:05
10/17/2017	Burgess: draft letter re Defendants' deficient RTA responses	written discovery	3:09:18
10/17/2017	Burgess: prepare FPTO and MILs	trial preparation	0:15:15
10/17/2017	Burgess: prepare FPTO and MILs	trial preparation	2:09:57
10/17/2017	Burgess: call with JL, SA, GH, TK, paralegal team re trial preparation	trial preparation	0:20:00
10/17/2017	Burgess: prepare FPTO and MILs	trial preparation	1:01:07
10/17/2017	Burgess: prepare FPTO and MILs	trial preparation	0:03:15
10/18/2017	Burgess: prepare FPTO and MILs	trial preparation	0:13:12
10/18/2017	Burgess: draft Daubert re Knox	pleadings	0:00:31
10/18/2017	Burgess: draft Daubert re Knox	pleadings	0:46:42
10/18/2017	Burgess: draft Daubert re Knox	pleadings	1:45:49
10/18/2017	Burgess: draft Daubert re Knox	pleadings	2:33:24
10/18/2017	Burgess: draft Daubert re Knox	pleadings	0:30:33
10/18/2017	Burgess: draft Daubert re Knox	pleadings	0:29:14
10/18/2017	Burgess: draft Daubert re Knox	pleadings	0:00:32
10/18/2017	Burgess: prepare FPTO and MILs	trial preparation	1:35:45
10/19/2017	Burgess: prepare FPTO and MILs	trial preparation	0:33:16
10/19/2017	Burgess: draft Daubert re Knox	pleadings	0:41:51
10/19/2017	Burgess: draft Daubert re Knox	pleadings	1:09:57
10/19/2017	Burgess: prepare for Tony Gee depo	depositions	0:09:41
10/19/2017	Burgess: prepare for Tony Gee depo	depositions	3:34:08
10/19/2017	Burgess: draft Daubert re Knox	pleadings	0:36:56
10/19/2017	Burgess: draft Daubert re Knox	pleadings	2:53:28
10/20/2017	Burgess: prepare for Tony Gee depo	depositions	0:54:45
10/20/2017	Burgess: draft Daubert re Knox	pleadings	0:56:44
10/20/2017	Burgess: prepare for Tony Gee depo	depositions	1:17:18
10/20/2017	Burgess: Tony Gee Depo	depositions	4:05:48
10/20/2017	Burgess: draft/revise MILs	pleadings	0:23:06
10/20/2017	Burgess: draft Daubert re Knox	pleadings	2:40:54

10/20/2017	Burgess: draft/revise MILs	pleadings	5:35:56
10/21/2017	Burgess: review/analyze Ds' reply ISO SJ	case development	1:32:45
10/23/2017	Burgess: draft/revise response to MILs	pleadings	0:39:44
10/25/2017	Burgess: prepare for SJ hearing	motions practice	1:15:26
10/25/2017	Burgess: prepare for SJ hearing	motions practice	3:24:53
10/25/2017	Burgess: prepare for SJ hearing	motions practice	5:04:16
10/25/2017	Burgess: prepare for SJ hearing	motions practice	2:15:09
10/26/2017	Burgess: prepare for and attend/argue SJ hearing	court hearing	8:51:25
10/27/2017	Burgess: draft/revise response to MILs	motions practice	0:15:53
10/27/2017	Burgess: call with JL, SA, GH, TK, paralegal team re trial preparation	trial preparation	1:28:02
10/27/2017	Burgess: draft/revise response to MILs	trial preparation	7:18:57
10/29/2017	Burgess: draft/revise FPTO	trial preparation	0:39:12
10/29/2017	Burgess: draft/revise FPTO	trial preparation	4:48:50
10/30/2017	Burgess: draft/revise FPTO	trial preparation	1:22:25
10/30/2017	Burgess: draft/revise FPTO	trial preparation	0:43:32
10/30/2017	Burgess: draft/revise FPTO	trial preparation	8:36:08
10/31/2017	Burgess: prepare for FPTC (analyze MILs and FPTO)	trial preparation	0:30:55
10/31/2017	Burgess: prepare for FPTC (analyze MILs and FPTO)	trial preparation	5:23:35
10/31/2017	Burgess: prepare for FPTC (analyze MILs and FPTO)	trial preparation	2:46:02
11/1/2017	Burgess: prepare for FPTC (analyze MILs and FPTO)	trial preparation	7:40:16
11/3/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	0:49:12
11/3/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	3:01:08
11/3/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	1:02:20
11/3/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	0:10:37
11/3/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	2:49:08
11/4/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	3:51:03
11/4/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	4:35:41
11/4/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	0:15:37
11/4/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	0:15:39
11/5/2017	Burgess: prepare for MIL hearing and exhibit objections	motions practice	1:33:45

11/5/2017	Burgess: prepare for MIL hearing and exhibit objections	motions practice	3:41:42
11/5/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	0:14:01
11/5/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	2:42:24
11/5/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	0:18:49
11/6/2017	Burgess: prepare for MIL hearing and exhibit objections	motions practice	0:28:20
11/6/2017	Burgess: prepare for and do MIL hearing and exhibit objections	court hearing	7:23:52
11/6/2017	Burgess: prepare for and do MIL hearing and exhibit objections	court hearing	7:17:53
11/7/2017	Burgess: trial (draft/revise proposed stipulations and GSR outline, attend trial, prep witnesses, discuss strategy re dismissing defs)	attend trial	14:39:46
11/7/2017	Burgess: trial (prep witnesses and outlines)	attend trial	1:07:45
11/8/2017	Burgess: trial (prepare GSR outlines, prepare Shavonda outline, attend trial)	attend trial	8:06:32
11/8/2017	Burgess: trial (prepare GSR outlines, prepare Shavonda outline, attend trial)	attend trial	5:41:51
11/8/2017	Burgess: trial (prep damage witness outline, GSR witness examination)	attend trial	4:25:00
11/9/2017	Burgess: trial (prep damage witness outline, GSR witness examination, attend trial)	attend trial	12:15:38
11/10/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	2:03:05
11/11/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	7:10:43
11/12/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	1:13:01
11/12/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	2:22:59
11/12/2017	Burgess: prepare witness outlines and conduct witness prep	trial preparation	6:59:08
11/13/2017	Burgess: prepare witness outlines and conduct witness prep, attend trial	trial preparation, attend trial	14:51:15
11/14/2017	Burgess: prepare witness outlines and conduct witness prep, attend trial	trial preparation, attend trial	18:57:40
11/15/2017	Burgess: prepare witness outlines and conduct witness prep, attend trial	trial preparation, attend trial	13:22:27
11/15/2017	Burgess: prepare witness outlines and conduct witness prep, attend trial	trial preparation, attend trial	0:47:53
11/16/2017	Burgess: prepare witness outlines and conduct witness prep, attend trial	trial preparation, attend trial	9:51:22

11/16/2017	Burgess: prepare witness outlines and conduct witness prep, attend trial	trial preparation, attend trial	1:45:06
11/16/2017	Burgess: prepare witness outlines and conduct witness prep, attend trial	trial preparation, attend trial	0:53:05
11/17/2017	Burgess: prepare witness outlines and conduct witness prep, attend trial	trial preparation, attend trial	12:17:00
11/18/2017	Burgess: prepare witness outlines and draft jury instructions and response to Rule 50 motions and Daubert proffer	trial preparation	0:31:29
11/18/2017	Burgess: prepare witness outlines and draft jury instructions and response to Rule 50 motions and Daubert proffer	trial preparation	1:47:36
11/18/2017	Burgess: prepare witness outlines and draft jury instructions and response to Rule 50 motions and Daubert proffer	trial preparation	2:18:49
11/19/2017	Burgess: prepare draft jury instructions and response to Rule 50 motions and Daubert proffer	trial preparation	2:03:08
11/19/2017	Burgess: prepare draft jury instructions and response to Rule 50 motions and Daubert proffer	trial preparation	0:41:52
11/19/2017	Burgess: prepare draft jury instructions and response to Rule 50 motions and Daubert proffer and closing argument and redacted trial exhibits	trial preparation	4:07:23
11/19/2017	Burgess: prepare draft jury instructions and response to Rule 50 motions and Daubert proffer and closing argument and redacted trial exhibits	trial preparation	5:05:44
11/20/2017	Burgess: prepare response to Rule 50 motions, attend trial, prepare notes for closing argument, prepare jury instructions, attend jury instruction conference, draft agreed jury instructions	trial preparation, attend trial	17:56:08
12/20/2017	Burgess: review/analyze post-trial motion	case development	1:50:55
12/20/2017	Burgess: review/analyze post-trial motion	case development	0:08:30
12/20/2017	Burgess: review/analyze post-trial motion	case development	0:10:38
12/20/2017	Burgess: review/analyze post-trial motion	case development	0:00:46
12/20/2017	Burgess: review/analyze post-trial motion	case development	1:26:19
1/17/2018	Burgess: call with trial team re PTM response	case development	0:25:26
1/26/2018	Burgess: draft/revise PTM response	pleadings	4:13:34
3/1/2018	Burgess: draft/revise case synopsis	case development	0:23:26
3/12/2018	Burgess: review/analyze opinion on post-trial motions	case development	0:39:57
3/30/2018	Burgess: research appellate rules and procedures and deadlines	case development	0:44:00

4/13/2018	Burgess: review/analyze docketing statement	case development	0:13:15
4/17/2018	Burgess: draft/revise objections to docketing statement	pleadings	0:43:28
4/17/2018	Burgess: review/analyze PTMs and appellate requirements	case development	0:22:02
4/29/2018	Burgess: research finality re fewer than all claims	case development	0:07:11
5/2/2018	Burgess: research judgment on indemnification claim and prepare for teleconference	case development	0:05:53
5/2/2018	Burgess: teleconference with judge and all parties re final judgment; follow-up debrief and strategy with trial team	case development	0:56:09
6/14/2018	Burgess: review/analyze post-trial briefing and appellate statement of issues for review	case development	1:25:55
6/14/2018	Burgess: review/analyze post-trial briefing and appellate statement of issues for review	case development	1:17:09
6/20/2018	Burgess: review/analyze briefing and prepare appellee's list of materials to include in appendix	case development	2:47:46
7/2/2018	Burgess: review/analyze opening appeal brief and prepare notes for response	case development	0:59:59
7/3/2018	Burgess: review/analyze opening appeal brief and prepare notes for response	case development	0:00:45
7/3/2018	Burgess: review/analyze opening appeal brief and prepare notes for response	case development	0:28:13
7/9/2018	Burgess: review/analyze opening appeal brief and prepare notes for response	case development	0:17:46
7/9/2018	Burgess: review/analyze opening appeal brief and prepare notes for response	case development	0:05:39
7/9/2018	Burgess: review/analyze opening appeal brief and prepare notes for response	case development	1:12:37
7/11/2018	Burgess: call with JL GH SA TK re response brief	case development	0:56:49
7/12/2018	Burgess: review/analyze record on appeal for issues of FBI admissibility	case development	1:09:09
10/15/2018	Burgess: research for response appellate brief re hearsay exception	case development	1:10:44
10/17/2018	Burgess: draft/revise response appellate brief	pleadings	0:26:49
10/19/2018	Burgess: draft/revise response appellate brief	pleadings	0:31:38
10/19/2018	Burgess: draft/revise response appellate brief	pleadings	0:04:31

10/19/2018	Burgess: draft/revise response appellate brief	pleadings	0:13:22
10/21/2018	Burgess: draft/revise response appellate brief	pleadings	1:40:58
10/21/2018	Burgess: draft/revise response appellate brief	pleadings	1:00:17
10/22/2018	Burgess: draft/revise response appellate brief	pleadings	7:24:03
10/22/2018	Burgess: draft/revise response appellate brief	pleadings	1:18:55
12/5/2018	Burgess: review/analyze Ds' reply brief and prepare for oral argument	case development	0:22:36
1/25/2019	Burgess: prepare for oral argument moot	case development	0:43:50
1/25/2019	Burgess: prepare for oral argument moot	case development	3:19:21
1/28/2019	Burgess: prepare for oral argument moot	case development	0:44:41
1/28/2019	Burgess: prepare for oral argument moot	case development	0:50:44
1/28/2019	Burgess: prepare for oral argument moot	case development	0:16:05
1/29/2019	Burgess: oral argument moot	court hearing	1:47:17
1/29/2019	Burgess: prepare for oral argument	case development	0:59:10
1/29/2019	Burgess: prepare for oral argument	case development	1:31:37
1/30/2019	Burgess: oral argument	court hearing	5:52:35
1/31/2019	Burgess: review/analyze argument and prepare 28(j) letter	case development	1:17:29
		TOTAL	813:19:23

Sarah Grusin				
Date	Description	Category	Duration	Hours
3/24/2016	Read complaint/Order on Motion to Dismiss	Written Discovery	0:00:00	0
3/24/2016	Read complaint/Order on Motion to Dismiss	Written Discovery	0:41:59	0.75
3/24/2016	Read complaint/Order on Motion to Dismiss	Written Discovery	0:12:37	0.25
3/30/2016	Meeting with Steve and Tess re: written Disco	Written Discovery	0:20:00	0.25
3/30/2016	Tess and SG call client	Written Discovery	0:10:00	0.25
3/31/2016	Draft FOIA requests, organize index file	Written Discovery	3:00:00	3
4/5/2016	Organizing Documents	Written Discovery	1:17:17	1.25
4/7/2016	mtg w/ Tess re: FOIA/MPIA requests	Written Discovery	0:15:00	0.25
4/8/2016	Draft FOIA requests, meet with Tess	Written Discovery	0:15:00	0.25
4/8/2016	Draft FOIA requests, meet with Tess	Written Discovery	0:12:00	0.25
4/13/2016	Draft MPIA request to BPD, State's Attorney Subpoena, Read Discovery Requests from Goldstein and Van Gelder	Written Discovery	0:57:00	1
4/19/2016	MPIA requests - Draft	Written Discovery	1:05:00	1
4/27/2016	Mtg w/ Tess and Steve re: Scheduling Order, initial Status report, scheduling deps	case development	0:45:00	0.75
4/27/2016	ESI Research for initial status report	Written Discovery	0:24:42	0.5
4/27/2016	ESI Research	Written Discovery	0:00:39	0
4/27/2016	ESI Research	Written Discovery	0:22:13	0.25
5/5/2016	Investigating the Scene	case development	1:00:00	1
5/5/2016	meeting with Sabein (re: interrogatories, etc.)	Case administration	2:30:00	2.5
5/5/2016	Meeting with Brian Rainey	case development	13:30:00	13.5
5/6/2016	meeting with Charles Dorsey	case development	4:30:00	4.5
5/10/2016	Emails w/ team and O/C re: Written discovery and deposition scheduling	Written Discovery	0:11:00	0.25
5/23/2016	Responses to INTs	Written Discovery	7:55:00	8
6/13/2016	call w/ BPD and Individual Defendants re: outstanding discovery	case administration	1:00:00	1
6/16/2016	Edit Sharon's letter to Judge re: Personnel Records/discovery dispute	Written Discovery	0:30:42	0.5
6/16/2016	t/c with o/c re: Plaintiff's Interrogatory responses (SA on call)	Written Discovery	0:30:00	0.5
6/27/2016	downloading, organizing, preliminary review of DSPCS documents produced by individual defendants	Written Discovery	0:07:00	0
7/5/2016	Dorsey and Ron Dyson Dep Prep	depositions	1:48:00	1.75
7/6/2016	Ron Dyson Meeting Prep -- t/c with Mort, Tess, and Steve + Follow up Convo with Tess/Steve	case development	0:15:00	0.25

7/6/2016	Team meeting re: Dorsey Dep Prep (SA + Tess)	depositions	0:45:00	0.75
7/6/2016	Dorsey and Ron Dyson Dep Prep	depositions	2:21:00	2.25
7/6/2016	Dorsey and Ron Dyson Dep Prep	depositions	0:00:01	0
7/6/2016	Dorsey and Ron Dyson Dep Prep	depositions	0:12:58	0.25
7/7/2016	Follow up and notes from Dyson Dep	depositions	0:24:00	0.5
7/7/2016	Travel to Dyson Deposition	depositions	3:30:00	3.5
7/7/2016	Ron Dyson Deposition	depositions	3:11:00	3.25
7/7/2016	Follow up emails w/ BPD re: outstanding discovery requests	Written Discovery	0:34:00	0.5
7/7/2016	Follow up emails w/ BPD re: outstanding discovery requests	Written Discovery	0:32:00	0.5
7/7/2016	Dorsey Dep Prep: Review documents	depositions	0:20:00	0.25
7/7/2016	Dorsey Dep Prep: Review documents	depositions	0:34:57	0.5
7/8/2016	Travel to Dorsey deposition	depositions	1:25:00	1.5
7/8/2016	Dorsey Deposition	depositions	2:20:00	2.25
7/12/2016	Follow up from Dyson Dep: names for Mort to investigate	Investigation	0:05:00	0
7/12/2016	Meeting w/ SA and TK re: Fowler Deposition	depositions	0:16:00	0.25
7/12/2016	Review documents from Medical Examiner	Written Discovery	0:10:00	0.25
8/4/2016	Travel to Gioia Deposition	depositions	3:00:00	3
8/4/2016	Gioia Deposition	depositions	6:30:00	6.5
8/4/2016	Travel from Gioia Deposition	depositions	2:30:00	2.5
8/24/2016	mtg with SA and SP re: privilege log	Written Discovery	0:15:00	0.25
11/2/2016	call w/ TB, GH, TK, SA re: BPD discovery, defendant Deps	depositions	0:59:00	1
11/2/2016	Call w/ TB, SA, and Colin G. (BPD) re: pending discovery disputes	case development	0:15:00	0.25
11/2/2016	Goldstein/Weese Dep Prep - review documents, notes on topics	depositions	1:30:00	1.5
11/2/2016	Review BCDSS documents	Written Discovery	1:20:00	1.25
11/3/2016	follow up email to Colin re: ongoing discovery disputes	case administration	0:53:00	1
11/3/2016	Review BCDSS documents	Written Discovery	1:20:00	1.25
11/3/2016	Review BCDSS documents	Written Discovery	0:28:06	0.5
11/3/2016	Review BCDSS documents	Written Discovery	2:18:57	2.25
11/4/2016	Goldstein and Weese Dep Prep	depositions	2:30:00	2.5
11/4/2016	Goldstein and Weese Dep Prep	depositions	1:03:35	1
11/7/2016	Weese Dep Prep	depositions	2:47:00	2.75
11/7/2016	Nissan pathfinder research	case development	0:24:00	0.5
11/7/2016	Call w/ Seaman, potential police practices expert (w/ TK)	Written Discovery	0:30:00	0.5
11/8/2016	Review Goldstein dep transcript	depositions	0:50:00	0.75
11/8/2016	Edit Goldstein outline/review docs	depositions	0:52:00	0.75
11/8/2016	Call w/ GH, TK	case development	0:14:00	0.25

11/8/2016	Call Neimeyer (left msg) collect documents to send	case development	0:06:00	0
11/8/2016	Call Neimeyer (left msg) collect documents to send	case development	0:19:17	0.25
11/8/2016	FOIA/ Howard Rice Follow Up + Van Gelder doc production	Written Discovery	0:47:57	0.75
11/8/2016	Edit Goldstein outline/review docs	depositions	0:25:00	0.5
11/9/2016	FOIA/ Howard Rice Follow Up + Van Gelder doc production	Written Discovery	0:24:00	0.5
11/9/2016	Weese Dep Prep	depositions	0:11:16	0.25
11/9/2016	Reply to Motion to Hold open depositions	Written Discovery	0:07:53	0.25
11/9/2016	Call w/ Niemeyer re: GSR report	case development	0:25:00	0.5
11/9/2016	Call w/ Niemeyer re: GSR report	case development	0:14:24	0.25
11/9/2016	Follow up re: Niemeyer -- email team, fill out retainer form, send docs, etc.	case development	0:24:27	0.5
11/9/2016	t/c with Gayle re: Goldstein Dep	depositions	0:11:00	0.25
11/9/2016	Weese Dep Prep	depositions	1:45:26	1.75
11/9/2016	Reply to Motion to Hold open depositions	Written Discovery	2:04:07	2
11/9/2016	t/c with Gayle re: Goldstein Dep	depositions	0:06:00	0
11/9/2016	Edit Patton/Nevedon Dep Outlines	depositions	0:11:31	0.25
11/10/2016	Calls and emails w/ Gayle, Tess re: Weese Dep	depositions	0:15:00	0.25
11/14/2016	research, contact Allee	case development	0:15:24	0.25
11/14/2016	Follow up re: Niemeyer -- email team, fill out retainer form, send docs, etc.	case development	0:11:37	0.25
11/14/2016	research, contact Allee	case development	0:09:15	0.25
11/14/2016	Reply to Motion to Hold open depositions	Written Discovery	0:16:58	0.25
11/14/2016	Stine - email and Follow up	case development	1:16:51	1.25
11/14/2016	emails/research on amending pleadings	Written Discovery	0:18:39	0.25
11/14/2016	emails/research on amending pleadings	Written Discovery	0:32:00	0.5
11/14/2016	emails w/ Colin, downloading, reviewing Doc Production	Written Discovery	0:24:00	0.5
11/14/2016	emails with team about amending pleadings/follow up discovery from Defendant Deps + research on amending pleadings	Written Discovery	1:31:23	1.5
11/14/2016	edit motion to amend pleadings	Written Discovery	0:59:53	1
11/15/2016	edit motion to amend pleadings	Written Discovery	0:37:00	0.5
11/15/2016	edit motion to amend pleadings	Written Discovery	0:12:00	0.25
11/15/2016	edit motion to amend pleadings + 1AC	Written Discovery	0:37:34	0.75
11/16/2016	emails with team about amending pleadings/follow up discovery from Defendant Deps + research on amending pleadings	Written Discovery	0:15:00	0.25

11/16/2016	Motion to file under seal	Written Discovery	0:30:00	0.5
11/17/2016	Research discovery dispute - Defendants Personnel Files	Written Discovery	0:44:52	0.75
11/17/2016	GSR doc review (for Van Gelder dep), emails with team about Rice/Dorsey investigation	Written Discovery	0:21:00	0.25
11/17/2016	GSR doc review (for Van Gelder dep), emails with team about Rice/Dorsey investigation	Written Discovery	0:10:10	0.25
11/21/2016	review document production	Written Discovery	0:57:39	1
12/27/2016	Review emails and recent motions/discovery	case development	0:21:39	0.25
12/27/2016	meeting w/ SA, TB, TK, GH re: discovery	case development	1:37:00	1.5
12/27/2016	Review Individual Defs. INT 2 responses	Written Discovery	0:21:16	0.25
12/29/2016	review emails re: discovery strategy (FBI Touhy request, Tony Gee, etc.)	case development	0:24:23	0.5
12/29/2016	review motion for grand jury transcripts, read plaintiff dep (partially), review BPD/individual defendants INT 3 responses	Written Discovery	1:58:18	2
12/30/2016	Review Sabein Dep	Written Discovery	0:17:23	0.25
1/4/2017	Review Sabein Dep (re: confidentiality designations and re: possible damages expert) + team call re: same (SA, TK, GH)	Written Discovery	0:54:11	1
1/4/2017	Call w/ o/c	case administration	0:36:10	0.5
1/5/2017	Follow up on MPIA requests re: Dorsey and Rice	Written Discovery	0:37:09	0.5
1/5/2017	Confer w/ team re: outline for prosecutor expert	case development	0:25:59	0.5
1/6/2017	confer with team via email regarding new docs in homicide file and discovery strategy	case development	0:25:00	0.5
1/11/2017	Edit 37.1 letter re: BPD Interrogatory Responses + Letter re: re-open defendant deps	Written Discovery	0:53:47	1
1/23/2017	telephonic court hearing re: Plaintiff's motion to amend complaint	court hearing	1:10:00	1.25
1/26/2017	mtg w/ GH, TB, SA, TK re: discovery next steps	case development	0:25:00	0.5
2/1/2017	Draft Doc requests for "little man" documents	Written Discovery	1:53:20	2
2/3/2017	prepare documents to send to expert (Niemeyer, GSR)	case development	0:24:00	0.5
2/3/2017	draft doc requests to BPD for GSR docs	Written Discovery	0:08:54	0.25
2/6/2017	review correspondence from Colin, follow up on discovery disputes	case development	0:07:16	0
2/10/2017	Burgess discovery requests + new disco for new individual defendants	Written Discovery	0:40:54	0.75

2/15/2017	Review Burgess records for Howard Rice docs ("Kevin")	Written Discovery	0:28:32	0.5
2/15/2017	Call w/ O/C re: 30(b)(6) deps w/ BPD + SA, GH, draft confirming letter	case administration	2:16:00	2.25
2/16/2017	draft/edit confirming letter for call w/ Colin + confer w/ SA re same	case administration	2:05:00	2
2/17/2017	review documents for "kevin" leads	Written Discovery	1:33:48	1.5
2/21/2017	Burgess - GJ motion follow up, emails w/ team re: motion to compel BPD responses to INTs	Written Discovery	0:11:00	0.25
2/27/2017	burgess - email w/ team re: discovery dispute over FOIA requests	Written Discovery	0:21:53	0.25
2/27/2017	burgess - email w/ team re: discovery dispute over FOIA requests (checking local rules, past agreements with OC)	Written Discovery	0:09:22	0.25
2/27/2017	burgess - email w/ team re: discovery dispute over FOIA requests (checking local rules, past agreements with OC)	Written Discovery	0:05:19	0
2/27/2017	burgess - email w/ team re: discovery dispute over FOIA requests	Written Discovery	0:36:39	0.5
2/27/2017	burgess - email w/ team re: discovery dispute over FOIA requests	Written Discovery	0:18:12	0.25
3/1/2017	Call chambers re: scheduling call for discovery dispute + email o/c re: same	case administration	0:10:50	0.25
3/2/2017	Call chambers re: scheduling call for discovery dispute + email o/c re: same	case administration	0:02:50	0
3/6/2017	review BPD recent document production	Written Discovery	0:14:36	0.25
3/9/2017	Edit letter to Court re: discovery disputes	Written Discovery	0:43:17	0.75
3/9/2017	Edit letter to Court re: discovery disputes	Written Discovery	1:29:00	1.5
3/13/2017	review BPD responses to RFP 2	Written Discovery	0:32:32	0.5
3/13/2017	review BPD responses to RFP 2	Written Discovery	0:18:02	0.25
3/14/2017	review BPD production + Rice info in prep for call with Court	Written Discovery	0:18:52	0.25
3/14/2017	Confer w/ SH and TK re: prep for Burgess Call w/ Court on 3/15	case development	0:21:23	0.25
3/14/2017	Prep for call with Court	court hearing	0:42:01	0.75
3/14/2017	Prep for call with Court	court hearing	1:02:44	1
3/15/2017	Prep for call with Court	court hearing	0:17:24	0.25
3/15/2017	Prep for call with Court	court hearing	0:07:41	0.25
3/15/2017	Call w/ Court	court hearing	0:57:00	1
3/15/2017	call w. o/c (Kelly + Tom) re: MPIO and criminal defense attorney file discovery	case administration	0:15:01	0.25
3/17/2017	Call re: Howard Rice Discovery filing w/ TB, GH, TK, SA	case development	0:19:43	0.25
3/17/2017	review draft ROG answers	Written Discovery	0:27:23	0.5
3/20/2017	Burgess - review BPD disco re: Rice murders	Written Discovery	0:32:01	0.5

3/21/2017	Call w/ Jessica Rothschild	case development	0:09:10	0.25
3/21/2017	Burgess - email to team re: Tayback INT responses	Written Discovery	0:05:43	0
3/22/2017	Review Lehman INT2 Response Draft + email team re: same	Written Discovery	0:08:47	0.25
3/28/2017	edit/draft Rice Motion	Written Discovery	0:50:00	0.75
3/28/2017	edit/draft Rice Motion	Written Discovery	0:06:19	0
3/28/2017	edit/draft Rice Motion	Written Discovery	1:35:01	1.5
3/29/2017	edit/draft Rice Motion	Written Discovery	0:58:02	1
3/29/2017	edit Rice Motion	Written Discovery	0:00:02	0
3/29/2017	edit Rice Motion	Written Discovery	0:29:28	0.5
3/30/2017	flight to chicago, from inspections	Written Discovery	2:55:00	3
3/31/2017	collect exhibits for Rice Motion	Written Discovery	0:10:14	0.25
3/31/2017	Review Documents for Rice Motion	Written Discovery	0:44:28	0.75
4/3/2017	edit Rice Motion	Written Discovery	0:46:41	0.75
4/3/2017	edit Rice Motion	Written Discovery	0:10:05	0.25
4/3/2017	Holmes and Taylor Prep	depositions	0:14:41	0.25
4/4/2017	edit Rice Motion	Written Discovery	0:22:34	0.5
4/4/2017	emails w/ team re: pending discovery requests/disputes etc.	Written Discovery	0:29:21	0.5
4/4/2017	emails w/ team re: pending discovery requests/disputes etc.	Written Discovery	0:01:35	0
4/4/2017	emails w/ team re: pending discovery requests/disputes etc.	Written Discovery	0:15:42	0.25
4/10/2017	edit Rice Motion	Written Discovery	0:56:38	1
4/10/2017	edit Rice Motion	Written Discovery	0:34:48	0.5
4/10/2017	edit Rice Motion	Written Discovery	0:23:18	0.5
4/10/2017	edit Rice Motion	Written Discovery	1:17:08	1.25
4/11/2017	Dwight Holmes Dep Prep	depositions	0:11:00	0.25
4/11/2017	emails w/ Burgess team	case development	0:09:06	0.25
4/11/2017	Burgess conference call re: experts + upcoming deps	case development	0:24:03	0.5
4/11/2017	Burgess - email w/ team re: new Defendants Answer	case development	0:22:21	0.25
4/12/2017	Dwight Holmes Dep Prep	depositions	0:18:08	0.25
4/12/2017	confer w/ SA and GH re Holmes dep	depositions	0:29:28	0.5
4/12/2017	Dwight Holmes Dep Prep	depositions	0:52:00	0.75
4/13/2017	travel to baltimore for dwight holmes dep	depositions	2:00:00	2
4/13/2017	investigate possible witnesses in Baltimore w/ Mort	Investigation	2:10:00	2.25
4/13/2017	meet with dwight holmes: dep prep	depositions	1:05:00	1
4/13/2017	dwight holmes dep	depositions	1:30:00	1.5
4/13/2017	follow up notes from dwight holmes dep.	depositions	0:20:00	0.25
4/13/2017	investigate possible witnesses in Baltimore w/ Mort	case development	2:46:55	2.75
4/18/2017	look up date of grand jury for motion	Written Discovery	0:04:46	0
4/19/2017	draft MPIA requests	Written Discovery	1:11:57	1.25

4/20/2017	draft letter + finalize MPIA requests	Written Discovery	0:09:12	0.25
4/20/2017	Confer w/ Team re: discovery steps (investigating, disclosing potential witnesses)	case development	0:33:12	0.5
4/20/2017	Call w/ GH re: discovery + investigating potential witnesses	case development	1:07:22	1
4/20/2017	Edit letter to Colin re: "Little Man" names	Written Discovery	0:34:54	0.5
4/24/2017	confer via email w/ team re: next round of written discovery	case development	0:15:00	0.25
4/26/2017	edit reply in support of Rice Motion: confer w/ Gayle via email; edit motion, and review current production of Rice documents (from MPIA requests) for reply	Written Discovery	0:35:19	0.5
4/26/2017	Draft email to Colin re: BPD's interference with Plaintiff's MPIA requests (per Wayne Brooks's 4/26/2017 email)	case administration	1:04:01	1
5/11/2017	download, organize, and review Coroner's file production	depositions	0:50:36	0.75
6/22/2017	Call w/ Niemeyer re: GSR expert report	Experts	0:45:00	0.75
6/23/2017	Review depositions to determine which ones to send to Niemeyer, GSR expert	Experts	0:12:01	0.25
6/23/2017	Review depositions to determine which ones to send to Niemeyer, GSR expert	Experts	0:05:51	0
6/27/2017	Call w/ Niemeyer re: GSR expert report	Experts	0:15:01	0.25
6/27/2017	review Niemeyer GSR report and make comments.	Experts	1:14:41	1.25
6/28/2017	Finalize comments on Wayne Neimeyer GSR report, draft email with	Experts	0:18:01	0.25
6/28/2017	Email with team re: GSR expert report, discussing possibility of adding additional opinions	Experts	0:13:06	0.25
6/29/2017	Review new draft of GSR expert report	Experts	0:21:36	0.25
6/29/2017	Review new draft of GSR expert report	Experts	0:27:13	0.5
6/29/2017	Review new draft of GSR expert report	Experts	0:12:48	0.25
8/3/2017	review defendants' expert disclosures	Experts	0:13:17	0.25
8/9/2017	Call w/ Wayne Neimeyer re: rebuttal report topics	Experts		0.5
8/9/2017	Email to team re: conversation with Neimeyer and rebuttal report topics	Experts		0.25
8/10/2017	Review Knox report, and take notes on key points, in advance of meeting with TK re: GSR rebuttal report	Experts		0.75
8/10/2017	Call w. Neimeyer and TK re: rebuttal report; type up summary of topics discussed	Experts		1

TOTAL	179
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Danielle Hamilton				
Date	Description	Category	Duration	Hours
10/17/2017	Burgess: team meeting	case development	1:00:00	1.00
10/16/2017	Burgess: read SJ materials to draft MILs	case development	2:00	2.00
10/17/2017	Burgess: draft admit Dorsey MIL	pleadings	8:00:00	8.00
10/17/2017	Burgess: draft MIL barring references to "judge"	pleadings	2:00:00	2.00
10/17/2017	Burgess: draft Tayback MIL	pleadings	12:00:00	12.00
10/19/2017	Burgess: edit admit Dorsey MIL	pleadings	2:00:00	2.00
10/18/2017	Burgess: find case cites for Tayback MIL	pleadings	3:00:00	3.00
10/23/2017	Burgess: draft Daubert response to exclude Binks	pleadings	12:00:00	12.00
10/24/2017	Burgess: draft Daubert response to exclude Stein	pleadings	12:00:00	12.00
10/26/2017	Burgess: draft Daubert response to exclude Murphy	pleadings	12:00:00	12.00
10/27/2017	Burgess: find case cites for response to Murphy MIL	pleadings	4:00:00	4.00
10/29/2017	Burgess: find case cites for jury instructions, draft preliminary jury instructions	trial preparation	10:00:00	10.00
10/28/2017	Burgess: find case cites for jury instructions, draft preliminary jury instructions	trial preparation	5:30:00	5.50
10/29/2017	Burgess: draft memo for trial team for FPTC re FRE 801(d)(2)	trial preparation	6:00:00	6.00
11/1/2017	Burgess: find case cites for motion to certify appeal as frivolous	case development	10:00:00	10.00
11/2/2017	Burgess: witness interview of Shavanda Gantt; draft interview notes to the team		4:00:00	4.00
			TOTAL	105.50

Anne Gottschalk			
Date	Description	Category	Time
10/3/2017	found cites for draft of sj facts	pleadings	10
10/6/17-10/8/17	cites for sj response brief	pleadings	10
10/9/17 8:30am- 10/10/17 8:00 am	edited, added cites, numbered exhibits, proofed response to defendants motion for summary judgment	pleadings	23.5
10/12/2017	drafted exhibit list for FPTO	trial preparation	3
10/18/2017	drated exhibit chart and email correspondence re chart	trial preparation	6
10/20/2017	found cites and pulled exhibits for Motions in Limine and formatted motions	pleadings	6
10/23/2017	pulled, formatted, labeled exhibits for trial	trial preparation	2.5
10/23/2017	prepared subpoenas for trial witnesses	trial preparation	2
10/24/2017	drated and sent trial subpoenas for defendants	trial preparation	1
	Burgess: call with JL, SA, GH, TK, paralegal team re trial preparation	trial preparation	1.5
10/26/2017	team discussion	trial preparation	0.5
11/1/2017	seven hours travel, 2.5 hour pretrial conference, two hours prepping with the team	trial preparation	12.5
11/8/2017	discussion with team	trial preparation	1.5
11/8/2017	trial day	attending trial	7.5
11/8/2017	post-trial of helping with exams, exhibits, witnesses	trial preparation	5
11/9/2017	trial day	attending trial	7.5
11/9/2017	post-trial of helping with exams, exhibits, witnesses	trial preparation	5
11/13/2017	trial day and team meeting	attending trial	8
11/13/2017	post-trial of helping with exams, exhibits, witnesses	trial preparation	5
11/14/2017	trial day	attending trial	7.5
11/14/2017	post-trial of helping with exams, exhibits, witnesses	trial preparation	5
11/15/2017	trial day	attending trial	7.5
11/15/2017	post-trial of helping with exams, exhibits, witnesses	trial preparation	5
11/16/2017	trial day	attending trial	7.5
11/16/2017	post-trial of helping with exams, exhibits, witnesses	trial preparation	5
11/16/2017	trial day	attending trial	7.5
11/16/2017	post-trial of helping with exams, exhibits, witnesses	trial preparation	5
11/17/2017	trial day	attending trial	7.5
11/17/2017	post-trial of helping with exams, exhibits, witnesses	trial preparation	5
11/18/2017	trial day	attending trial	7.5
11/18/2017	post-trial of helping with exams, exhibits, witnesses	trial preparation	5
11/20/2017	trial day	attending trial	7.5
11/20/2017	post-trial of helping with exams, exhibits, witnesses	trial preparation	5
11/21/2017	closings and jury instructions	attending trial	5
		TOTAL	210.5

Lauren Lebata			
Date	Description	Category	Hours
3/24/2015	filing complaint, locating officers and drafting summonses	pleadings, case development	2
3/24/2015	drafting and filing pro hac motion on behalf of Steve Art	pleadings	0.5
3/30/15, 3/31/15, 4/14/15, 4/15/15, 4/21/15, 4/22/15, 5/1/15, 5/4/15, 5/5/15, 5/7/15, 5/22/15	email exchanges with process servers re: service of retired officers	background investigation, case administration	5
7/9/2015	pull exhibits, proof, and draft table of contents and authorities for Plaintiff's Response to Defendants' Motion to Dismiss and file on ecf.	pleadings	4
3/24/2016	draft and file pro hac motion on behalf of Sarah Gruisin	pleadings	1
3/24/2016	draft and file pro hac motion for Theresa Kleinhaus	pleadings	0.5
3/24/2016	draft and file pro hac motion for Arthur Loevy	pleadings	0.5
5/12/2016	email exchange with Mort Smith and Steve Art re: locating and serving third party witnesses	case administration	0.5
5/25/16-5/26/16	find addresses, draft deposition subpoenas and notices of witnesses and serve on all counsel and send to process servers	case administration	1
6/1/16-6/3/16	email exchange with Denovo Process Servers regarding third party witness subpoena service	case administration	1
2/3/17, 2/6/17	prepared waivers for new defendants	case administration	1
2/10/2017	prepared subpoenas and found locations for third party police officers	case administration	0.5
2/27/2017	ran searches for witness names from the homicide file on LocatePlus	background investigation	0.5
3/2/2017	searched for documents relating to Al Marcus in production	case development	1
3/14/2017	production of evidence photos and emails	document production	0.5
3/21/2017	drafted subpoenas, scheduled depositions and pulled documents for witnesses	case development, case administration	2.5
3/27/2017	proof and format plaintiffs' interrogation response to Lehman	interrogatories	1
3/27/2017	drafted verification for plaintiff and mailed responses to defendants discovery requests to plaintiff	interrogatories	0.25
4/3/2017	reviewed Rice files for Defendants names and drafted summaries of Rice murders	case development	4
3/28/2017, 4/4/2017	drafted request for production and served on defendants	written discovery	0.5
1/24/2017	drafted foia requests	case development	1
4/4/2017, 4/7/2017	drafted MPIA requests and followed up on outstanding requests	case development	2
4/18/2017, 4/19/2017	compiled and produced a subpoena response re: Latasha McFadden	document production	1
4/21/2017	searched through discovery for a witness	case development	2

4/26/2017	pulled exhibits for Plaintiff's Reply in Support of his Motion Regarding Files on Howard Rice Homicides, proofed, and filed	pleadings	1
5/1/2017	drafted a notice of depositions and booked court reporter for defendant depositions	case administration, depositions	0.25
5/3/2017	searched production for witness names and information	case development	2
5/4/2017, 5/11/17	printed and mailed documents for dep prep	depositions	2
5/17/2017, 5/23/17, 5/25/17	email exchange and coordinating service re: judge doory	case administration	1.5
5/22/17, 5/23/2017	coordinated deposition of defendant weese with all counsel	case administration	1
6/6/2017	deposition exhibit searching and pulling	depositions	0.5
6/15/2017	proofing and editing Plaintiff's responses to defendants interrogatories	interrogatories	4
6/22/2017, 6/27/17	pulled and sent docs to expert	case development	0.5
8/24/2017, 8/28/17	found cites and proofed and formatted Plaintiff's second set of Requests to Admit	written discovery	1
8/28/2017	updated interrogatory responses to all defendants and served on counsel	interrogatories	1
9/26/2017	drafted deposition abstracts of wanda austin and james bagley	case development	3
9/28/2017	deposition abstract of defendant weese	case development	4
9/30/2017	deposition abstract of defendant skinner	case development	3
10/3/17-10/5/2017	found cites for draft of sj facts	pleadings	10
10/6/17-10/8/17	cites for sj response brief	pleadings	10
10/8/2017	email exchange with gayle and research re: Pathfinder gas tank and gas light	case development	0.25
10/9/17 8:30am-10/10/17 8:00 am	edited, added cites, numbered exhibits, proofed response to defendants motion for summary judgment	pleadings	23.5
10/11/2017	filed plaintiff's supplemental responses to defendants' first set of interrogatories	pleadings	0.25
10/12/2017	drafted exhibit list for FPTO	trial preparation	3
10/17/2017	edited witness list for FPTO	trial preparation	0.5
10/18/2017	drafted exhibit chart and email correspondence re chart	trial preparation	6
10/19/2017	drafted MILs chart	pleadings	0.5
10/19/2017	edited and culled trial exhibits	trial preparation	2
10/19/2017	edited trial exhibits, for id only	trial preparation	1.75
10/20/2017	found cites and pulled exhibits for Motions in Limine and formatted motions	pleadings	6
10/23/2017	pulled, formatted, labeled exhibits for trial	trial preparation	2.5
10/23/2017	formatted letter and declaration of relevancy to DEA	case development	0.5
10/23/2017	prepared subpoenas for trial witnesses	trial preparation	2
10/25/2017, 10/26/17	coordinated deposition video syncing with court reporter	depositions	1
10/27/2017	formatted and organized and found cites for responses to defendants' MILs	pleadings	4.5
10/24/2017	drafted and sent trial subpoenas for defendants	trial preparation	1

10/30/2017	reviewed medical examiner testimony	case development	0.25
10/30/2017	reviewed Dorsey prison file	case development	1.75
10/30/2017	reviewed Burgess prison file and compiled infractions	case development	2.25
10/31/2017	drafted defendant indemnification list	case development	0.75
11/2/2017	created photo demonstrative for trial	trial preparation	0.25
11/1/2017	political research on maryland counties for jury duty	trial preparation	1.25
11/6/2017	prepped and ordered photo demonstratives	trial preparation	0.5
11/6/2017	bates stamped and produced photo exhibits for trial	trial preparation	0.5
11/7/2017	jury research	trial preparation	2.25
11/13/2017	drafted and sent letter to Latasha McFadden	trial preparation	0.25
11/15/2017	filed motion for writ	trial preparation	0.25
11/15/2017	worked on logistics for Bagley writ with prison	trial preparation	1
11/16/2017	drafted second letter for Latasha McFadden	trial preparation	0.25
4/12/2018	filed letter	trial preparation	0.25
10/11/2021	compiled hours for fee petition	fee petition	5
10/25/2021	re-created hours for paralegals	fee petition	1.5
10/26/2021	formatted fee petition hours for paralegals and attorneys	fee petition	4
10/27/2021	formatted fee petition hours and declaration for paralegals and attorneys	fee petition	2
10/28/2021	recreated fee petition hours and declarations for investigators and former attorneys	fee petition	4
10/28/2021	entered data into costs spreadsheet	fee petition	4
10/29/2021	entered data and finalized costs spreadsheet	fee petition	2
10/29/2021	redacted receipts	fee petition	0.5
10/29/2021	formatted, edited, finalized fee petition	fee petition	4
TOTAL			172.5

Sarah Pfander				
Date	Description	Category	Duration	Hours
1/19/2017	Finalizing MPIA document requests to BPD	written discovery	0:22:21	0.4
2/27/2017	Document Production	case administration	1:17:03	1.3
2/27/2017	Document Production	case administration	0:10:12	0.2
3/10/2017	Filing correspondence	pleadings	0:16:17	0.3
3/21/2017	Reviewing document production for Tayback material	case development	1:01:21	1
3/21/2017	Reviewing document production for Tayback material	case development	0:17:24	0.3
3/24/2017	research for Tess	case development	0:56:52	0.9
4/3/2017	Searching Rice documents for defendants	case development	0:28:09	0.5
4/4/2017	Following up on various document requests	written discovery	0:26:49	0.4
4/4/2017	Reviewing Howard Rice material	case development	0:15:36	0.3
4/4/2017	Following up on various document requests	written discovery	0:18:33	0.3
4/4/2017	Reviewing Howard Rice material	case development	0:54:18	0.9
4/5/2017	Drafting and issuing document subpoenas	case development	0:57:53	1
4/6/2017	Sending notice of document subpoenas	case development	0:38:57	0.6
4/10/2017	proofing and filing motion	pleadings	0:09:49	0.2
4/10/2017	proofing and filing motion	pleadings	0:50:16	0.8
4/10/2017	proofing and filing motion	pleadings	0:26:34	0.4
4/12/2017	Printing and sending courtesy copy	pleadings	0:21:08	0.4
4/17/2017	Deposition prep for Latasha McFadden	depositions	1:04:44	1.1
4/20/2017	Mailing and producing MPIA requests	case administration	0:40:48	0.7
4/24/2017	Drafting discovery requests	written discovery	3:01:24	3
4/25/2017	Editing MPIA requests and searching for Little Man information	case development	1:13:35	1.2
4/25/2017	Editing and sending discovery requests	written discovery	0:40:10	0.7
4/26/2017	Following up on MPIA requests	case development	1:39:09	1.7
4/26/2017	Document Production	case administration	0:09:52	0.2
4/26/2017	Document Production	case administration	0:53:23	0.9
4/27/2017	Printing and sending courtesy copy	case administration	0:15:29	0.3
5/1/2017	Organizing MPIA Responses	case administration	0:43:52	0.7
5/4/2017	Deposition prep for Lehmann	depositions	1:36:51	1.6
5/4/2017	Producing MPIA correspondence	case administration	0:25:36	0.4
5/5/2017	Requesting MPIA documents	case administration	1:01:08	1
5/5/2017	Deposition preparation for Goldsteins dep	depositions	1:39:11	1.7
5/5/2017	Deposition preparation for Goldsteins dep	depositions	0:38:52	0.6
5/8/2017	Amending discovery responses to add witnesses	written discovery	0:26:44	0.4
5/8/2017	Compiling address information for newly disclosed witnesses	case administration	0:28:24	0.5
5/8/2017	Reviewing Howard Rice material	case development	0:40:20	0.7
5/8/2017	Reviewing Howard Rice material	case development	0:14:52	0.2
5/8/2017	Compiling requests for arrest reports	case development	0:21:00	0.4
5/9/2017	Indexing all police reports	case development	2:48:02	2.8
5/9/2017	Indexing all police reports	case development	0:10:37	0.2

5/9/2017	Indexing all police reports	case development	0:55:40	0.9
5/11/2017	Indexing all police reports	case development	0:02:06	0
5/11/2017	Compiling requests for arrest reports	case administration	1:01:04	1
5/12/2017	Preparing and producing documents	case administration	0:16:02	0.3
5/12/2017	Compiling requests for arrest reports	case administration	0:44:55	0.7
5/16/2017	Document Production	case administration	0:15:32	0.3
5/17/2017	Indexing all police reports	case development	4:21:46	4.4
5/17/2017	Printing Dep Exhibits	depositions	0:25:28	0.4
5/23/2017	Preparing and sending subpoenas for Tayback material	case administration	0:17:44	0.3
5/23/2017	Preparing and sending subpoenas for Tayback material	case administration	0:42:19	0.7
5/23/2017	Preparing and sending subpoenas for Tayback material	case administration	0:10:58	0.2
5/23/2017	Document Production	case administration	0:05:37	0.1
5/30/2017	Prepping material for expert review	case development	1:05:38	1.1
5/31/2017	Sending materials to Joseph Stine	case administration	0:41:13	0.7
5/31/2017	Organizing expert materials	case administration	0:48:21	0.8
5/31/2017	Document Production	case administration	0:30:59	0.5
6/1/2017	Printing material for Sabein's dep	depositions	1:27:36	1.5
6/1/2017	Comparing Steptoe Subpoena Response to Rothschild File	case development	0:19:26	0.3
6/13/2017	Document Production	case administration	0:38:06	0.6
6/14/2017	Printing and sending material to Joseph Stine	case administration	0:39:33	0.7
6/16/2017	Scanning subpoena correspondence	case administration	0:13:05	0.2
6/16/2017	Editing interrogatory responses	written discovery	1:05:21	1.1
6/16/2017	Reviewing and producing subpoena response	case administration	0:12:20	0.2
6/16/2017	Editing interrogatory responses	written discovery	1:26:47	1.4
6/16/2017	Editing interrogatory responses	written discovery	1:45:55	1.8
6/16/2017	Editing and sending interrogatory responses	written discovery	0:55:02	0.9
6/22/2017	Reviewing Defendants discovery requests	written discovery	1:02:08	1
6/29/2017	Editing synopsis of Rice material	case development	1:15:02	1.3
6/29/2017	Editing synopsis of Rice material	case development	0:16:57	0.3
6/29/2017	Editing synopsis of Rice material	case development	1:01:25	1
6/29/2017	Editing synopsis of Rice material	case development	0:43:04	0.7
6/30/2017	Sharing Rice Docs with Murphy	case administration	0:34:56	0.6
7/6/2017	Producing Howard Rice Memo	case administration	0:13:58	0.2
7/6/2017	Pulling citations from Howard Rice Memo	case development	1:03:43	1.1
7/10/2017	Reading defendant depositions for testimony about Howard Rice	case development	1:19:37	1.3
7/10/2017	Reading defendant depositions for testimony about Howard Rice	case development	0:24:52	0.4
7/10/2017	Reading defendant depositions for testimony about Howard Rice	case development	0:46:33	0.8
7/14/2017	Reviewing/editing list of material reviewed for Stine's report	case development	1:06:25	1.1
7/26/2017	Organizing defendant's document production	case administration	2:32:43	2.5

8/11/2017	Drafting subpoenas and notices for expert deps	case administration	1:15:25	1.3
4/16/2019	Completing and filing Bill of Costs	case administration	0:45:55	0.8
4/30/2019	Binding and sending courtesy copies	case administration	0:38:49	0.6
6/3/2019	Filing Burgess NOA with SL	pleadings	0:12:59	0.2
6/17/2019	Indexing Trial Transcript	case administration	1:11:21	1.2
6/20/2019	Editing and filing response to docketing statement	pleadings	1:20:21	1.3
7/3/2019	Proofing and Filing notice of correction	pleadings	0:17:04	0.3
7/31/2019	Reviewing Joint Appendix for condensed transcript pages	pleadings	1:01:16	1
8/1/2019	Reviewing Joint Appendix for condensed transcript pages	pleadings	2:18:11	2.3
			TOTAL	73.6

Margaret Cunliffe				
Date	Description	Category	Duration	Time
9/25/2019	burgess - updating cites on response brief	pleadings	1:49:12	2
9/26/2019	burgess - finding fbi memo exhibits - defs and pltfs	pleadings	0:14:26	0.25
9/26/2019	burgess - updating cites on response brief	pleadings	1:10:36	1.25
9/26/2019	burgess - updating cites on response brief	pleadings	0:29:18	0.5
9/26/2019	burgess - updating cites on response brief	pleadings	1:36:15	1.5
9/26/2019	burgess - updating cites on response brief	pleadings	0:30:41	0.5
9/26/2019	burgess - updating cites on response brief	pleadings	0:14:37	0.25
9/27/2019	burgess - creating supplemental appendix	pleadings	2:28:00	2.5
9/27/2019	burgess - proofing and filing motion for an extension of time	pleadings	0:25:23	0.5
9/30/2019	burgess - formatting, proofing, and updating cites in 2nd appeal response brief	pleadings	2:01:35	2
9/30/2019	burgess - formatting, proofing, and updating cites in 2nd appeal response brief	pleadings	0:55:12	1
9/30/2019	burgess - formatting, proofing, and updating cites in 2nd appeal response brief	pleadings	0:36:10	0.75
9/30/2019	burgess - formatting, proofing, and updating cites in 2nd appeal response brief	pleadings	0:37:46	0.75
9/30/2019	burgess - formatting, proofing, and updating cites in 2nd appeal response brief	pleadings	1:37:36	1.75
10/1/2019	burgess - formatting, proofing, and updating cites in 2nd appeal response brief	pleadings	3:06:54	3.25
10/1/2019	burgess - formatting, proofing, and updating cites in 2nd appeal response brief	pleadings	1:59:42	2
10/1/2019	burgess - formatting, proofing, and updating cites in 2nd appeal response brief	pleadings	2:42:41	2.75
10/2/2019	burgess - formatting, proofing, and updating cites in 2nd appeal response brief	pleadings	0:14:46	0.25
10/2/2019	burgess - formatting, proofing, and updating cites in 2nd appeal response brief	pleadings	2:33:06	2.5
10/2/2019	burgess - formatting, proofing, and updating cites in 2nd appeal response brief	pleadings	0:24:32	0.5
10/2/2019	burgess - compiling supp appendix	pleadings	2:56:03	3

10/3/2019	burgess - response brief final proofing	pleadings	4:02:32	4
10/4/2019	burgess - making corrections to brief filing	pleadings	0:23:00	0.5
10/4/2019	burgess - drafting motion to file supp appendix	pleadings	0:31:58	0.5
10/7/2019	burgess - responding to email re: what was omitted from the 2nd JA	pleadings	0:36:41	0.75
10/9/2019	burgess - sending out brief and supplemental appendix	pleadings	1:24:37	1.5
10/18/2019	burgess - resending appendix	pleadings	0:42:50	0.75
1/8/2020	burgess - updating cites in and proofing reply brief draft	pleadings	2:33:53	2.5
1/9/2020	burgess - updating cites in and proofing reply brief draft	pleadings	0:39:00	0.75
1/10/2020	burgess - updating cites in and proofing latest draft of reply brief draft	pleadings	0:27:41	0.5
1/10/2020	burgess - updating cites in and proofing latest draft of reply brief draft	pleadings	0:28:57	0.5
1/10/2020	burgess - updating cites in and proofing latest draft of reply brief draft	pleadings	1:45:27	1.75
1/10/2020	burgess - updating cites in and proofing latest draft of reply brief draft	pleadings	0:53:40	1
1/10/2020	burgess - building toa + toc for reply brief	pleadings	1:19:02	1.5
1/10/2020	burgess - final proof + cite check of reply brief	pleadings	2:26:12	2.5
1/13/2020	burgess - sending out paper copy of reply brief	pleadings	0:26:07	0.5
			TOTAL	49.25

Valerie Barajas			
Date	Description	Category	Hours
10/25/2017	Upload video depositions of John Skinner onto network; send to court reporter via Hightail	Depositions	2.5
10/26/2017	Print, bind, label trial exhibits	Trial Preparation	2.75
10/27/2017	Print, bind, label trial exhibits	Trial Preparation	2
10/28/2017	Print, bind, label trial exhibits	Trial Preparation	2
11/7/2017	Assist with jury research	Trial	2.25
11/27/2017	Compiled hours for fee petition	Post-Trial	1
11/28/2017	Compiled hours for fee petition	Post-Trial	0.75
4/9/2019	Proofing, editing and formatting of Pplaintiff's Resp in Opp tp Defs MTD Monell Claims	Pleadings	0.5
10/26/2021	Formatted fee petition hours for attorneys	Fee Petition Preparation	4
10/27/2021	Formatted fee petition hours for attorneys	Fee Petition Preparation	3.5
10/28/2021	Formatted fee petition hours for paralegals and attorneys	Fee Petition Preparation	9
	Total Hours		30.25

BLAKE'S BURGESS HOURS			
DATE	DESCRIPTION	Category	HOURS
9/21/2017	Dep Abstracts	case development	1.0
9/26/2017	Dep Abstracts	case development	2.0
9/27/2017	Dep Abstracts	case development	2.0
10/3/2017	Exhibit Prep	pleadings	2.0
10/4/2017	Cite searching	pleadings	3.5
10/6/2017	Editing draft & exhibit prep	pleadings	6.5
10/8/2017	Cite searching	pleadings	4.0
10/9/2017	Editing draft & exhibit prep	pleadings	16.0
Total			37.0

Hersheeta Suri			
Date	Description	Category	Hours
7/27/2021	Burgess Fee Petition	fee petition	3:00
8/27/2021	Burgess Fee Petition	fee petition	4:00
8/30/2021	Correct Filing for Burgess Fee Petition	fee petition	2:00
9/28/2021	Burgess Filing Ext. for Attorney Fees and Costs	fee petition	1:00
		Total	10

Melinda Ek			
Date	Description	Category	Time
4/22/2015	Call w/ Haegerstown DOC re: Burgess Probation Computer Issue; Called Sabein and left message; sent email to GH re: the same	case administration	0.25
5/13/2016	Coordinate service of Subpoena to Laura Brokaw; Notice and Subponea - email opposing counsel re: the same	case administration	0.5
11/18/2016	Print and send documents to Stine	case administration	0.5
12/2/2016	Coordinate check to McCrone and Associates (Neimeyer)	case administration	0.25
12/7/2016	Locate pleadings and deps to send to GH	case administration	0.25
12/9/2016	Cite check with Omnibus Reply to Defs Resp. in Partial Opposition to Plaintiff's Motion to Amend.	pleadings	0.5
12/13/2016	Courtesy Copy of brief	pleadings	0.5
12/14/2016	Highlight and Redact portions of S. Burgess Dep	case administration	0.5
2/16/2017	Coordinate with North Branch Correctional Inst. Re: Visit with Mort	case administration	0.25
10/10/2017	Call from Clerk re: Response and missing exhibits; drafted letter and filed with the Clerk (Dkts. 193 & 195)	case administration	0.5
10/10/2017	Courtesy Copy of brief	case administration	1.5
10/30/2017	Coordinate writs for Dorsey & Bagley, draft email to USDOJ re: the same	trial preparation	0.25
11/7/2017	Jury Voir Dire	trial preparation	1
4/16/2018	Work on admission to 4th Cir for Jon, Steve, Tess, Tony B.; coordiate checks with Thayer re: the same	case administration	2
8/4/2020	File Notice re: Conflict of Proposed dates	pleadings	0.25
11/3/2020	Email with SA/JL re: notice of oral ack; file re: the same	case administration	0.25
6/25/2020	Filed Plaintiff's Motion for Attorneys' Fees and Costs	pleadings	0.25
TOTAL			9.5

Mort Smith

Date	Description	Category	Hours
1/7/2015	Traveled to Baltimore for meet with witnesses for case investigation	investigation	7
1/12/2015	traveled to Baltimore to meet with Gayle Horn and interview witnesses Tawanda Dyson and Brian Rainey. Took affidavits	investigation	8
5/3/2016	Research on witness locations	investigation	1
5/11/2016	Correspondence with Steve Art re: locating witnesses	investigation	0.2
5/19/2016	Travel to Baltimore to attempt to locate witnesses. Served subpoenas on Ike Dawson, Wanda Alson, Laura Shack, and Antonio Gioa.	investigation	11
5/25/2016	Call with Steve Art re: case investigation	investigation	0.5
6/16/2016	Travel to Baltimore to attempt to locate witnesses. Met with Brian Rainey and Tawanda Dyson with Tess Kleinhaus	investigation	9
6/17/2016	Witness investigation in Baltimore and return travel to Chicago	investigation	11
6/29/2016	Travel to Baltimore. With Tess Kleinhaus, met with Ron Dyson. With Steve Art and Tess Kleinhaus, met with Wanda Austin; return flight to Chicago	investigation	14
9/7/2016	Travel to Baltimore for investigation	investigation	4
9/8/2016	Witness investigation with Tess Kleinhaus. Met with Raymond Handy	investigation	8
9/9/2016	Witness investigation with Tess Kleinhaus. Return travel to Chicago	investigation	7
10/3/2016	Travel to Baltimore for witness investigation. Witness investigation. Met with Troy Williams and Lashanda Roberts	investigation	12
10/4/2016	Witness investigation. Travel to Chicago from Baltimore	investigation	4
10/28/2016	Travel to Baltimore and conduct witness investigation.	investigation	10
12/28/2016	Travel to Baltimore and conduct witness investigation. Met with Tony Gee and Sonia Beverly; looked for other witnesses.	investigation	6
1/30/2017	Correspondence with Gayle Horn regarding investigation	investigation	0.25
2/1/2017	Travel to Baltimore for witness investigation. Met with Dwight Holmes. Looked for other witnesses	investigation	6
2/2/2017	Witness investigation. Met with Patricia Brooks	investigation	8
2/21/2017	Traveled to Baltimore for witness investigation	investigation	4
10/13/2017	Phone conversation with witness Tawanda Dyson. Phone conversation with witness Rakim Muhammad.	investigation	0.75
10/17/2017	Multiple phone conversations with Attorney Horn regarding witness Rakin Muhammad. Multiple phone conversations with witness Rakin Muhammad.	investigation	1.25
10/18/2017	Phone conversation with witness Tawanda Dyson. Phone conversation with Attorney Horn.	investigation	0.25
10/19/2017	Drove from home office to Chicago office to pick up subpoenas and witness checks.	investigation	1
10/19/2017	Multiple phone calls with witness Yvette Jones regarding her mother's medical records.	investigation	0.75
10/20/2017	Travel to Baltimore; met with Rakin Muhammad. Attempt to locate additional witnesses. Travel home. Pickup witness checks at Chicago Office	investigation	15

	Traveled to Baltimore. With Tess Kleinhaus met with and served subpoenas on Tawanda Dyson, Lashanda Folkes, Tanya Thompson, Ronald Dyson, Louis McAllister, Dwight Holmesm and Troy Williams.		
10/25/2017	Attempted to locate additional witnesses	investigation	14
10/26/2017	Attempted to locate additional witnesses. Travel home	investigation	6.5
	Travel to Baltimore; drove to courthouse at 100 Calvert Street, Baltimore, MD and rceived certified copy of conviction for Charles Dorsey. Located and served witness Wanda Austin and Amanda Johnson; tried to locate additional witnesses; transported and spoke with Tawanda Dyson and Brian Rainey with Tess Kleinhaus	investigation	18
11/1/2017			
11/2/2017	Tried to locate additional witnesses and serve with trial subpoenas	investigation	7.5
11/3/2017	Witness investigation	investigation	1.5
11/5/2017	Multiple phone calls with Tawanda Dyson	investigation	2
	Travel to Baltimore. Attempted to locate witnesses. Served Troy Williams and discussed scheduling of testimony	investigation	16
11/7/2017			
11/8/2017	Witness investigation. Interviewed Amanda Johnson. With Gayle Horn, prepared witness Patrice Brooks	investigation	12
	Witness investigation. Phone calls with trial wtinesses regarding upcoming trial	investigation	5.5
11/9/2017			
	Travel to Baltimore; transport witnesses Tawanda Dyson and Brian Rainey for prepatory meeting with Attorneys Gayle, Tess and Tony. Met with witess Brian Rainey. Transported Tawanda Dyson Home after prep meeting.	investigation	5.5
11/13/2017			
11/14/2017	Helped coordinate and manage witnesses Tawanda Dyson and Brian Rainey.	investigation	5
	Phone calls to Eastern Correctional Faciity regarding James Bagley. Met with Tess regarding Brian Rainey and Ronald Dyson. Met with Gayle about witness schedule. On Standby.	investigation	9
11/15/2017			
	Drove to 8629 Glen Hannah Ct, Windsor Mills, MD to deliver personal item to witness Ronald Dyson. Transported Tawanda Dyson to court for her testimony. Waited until she completed her testimony. Transported her home. Traveled home	investigation	16
11/16/2017			
TOTAL			268.45